

Operations Manual
Interactive Betting N.V.
FanSport and TopBet

Field	Operational Value
Licence Holder	Interactive Betting N.V.
Company Registration Number	142759
CGA Licence Reference	OGI/2024/537/0691
Licence Type and Status	B2C Online Gaming Licence - Indefinite
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Registered and Operational Address	Seru Loraweg 17 C, Willemstad, Curaçao
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This manual describes the live operational framework, controls, procedures, records and evidence structure used by the Operator for the FanSport and TopBet remote gaming operations under the Curaçao licence referenced above.

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How to Use This Manual

This document is a controlled operating manual for Interactive Betting N.V. It is designed for regulatory review, management sign-off and day-to-day operational reference. The main chapters describe the control framework; Appendix A contains screenshot evidence; Appendix B contains controlled values and evidence references; Appendix C lists source materials.

Reader	Use First	Evidence to Check
New staff	Read the Quick Start, RACI, checklists, exception guide and the chapter matching the assigned role.	Training record, access approval and role acknowledgement.
Compliance	Use Sections 1, 2, 10, 14, 16, 17, 19, 20 and Appendix A for CGA evidence preparation.	Operator compliance evidence repository and Platform evidence pack.
Operations / Support	Use payment, KYC, RG, complaints and exception procedures for daily handling.	Tickets, customer communications, case notes and escalation logs.
IT / Product / QA	Use supplier, game integrity, security, DR, testing and change-control procedures.	Release notes, test reports, certificates, monitoring and access-review records.
Management	Use RACI, KPIs, evidence pack, incident and change-control sections for oversight.	Approval table, KPI pack, minutes and action tracker.

Quick Start for New Staff

1. Confirm your role, reporting line and system access approval before using any production tool.
2. Read the RACI matrix and the chapter that matches your operational function.
3. Complete mandatory onboarding training before handling players, payments, KYC cases, complaints or platform changes.
4. Use the Operational Checklists before launching a game, adding a payment method, changing a player-facing policy, closing a complaint or submitting CGA evidence.
5. Escalate exceptions immediately through the owner listed in the Exception Handling Guide.
6. Store evidence only in the approved Operator compliance evidence repository or Platform evidence pack.

Roles and Responsibilities / RACI Matrix

Named individuals are intentionally replaced with role titles in the manual body. Current names, signatures and delegated authorities are retained in the approved management evidence pack.

Activity	R	A	C	I
Manual ownership and version control	Operations Manual Owner	Compliance Owner	Legal, IT Security, Product	Resident Managing Director, CGA Reporting Owner
CGA inspection / regulatory request	CGA Reporting Owner	Compliance Owner	Department Owners, Legal	Resident Managing Director
Game launch or disablement	Product Owner / QA Owner	Product Approver	Compliance, IT Security, Finance	Support, Marketing, Management
Payment method launch / withdrawal control	Payments and Finance Owner	Finance Approver	Compliance, AML/CFT Officer, Platform Provider	Support, Management
KYC / AML / sanctions escalation	AML/CFT/CPF Compliance Officer	Compliance Owner	Support, Payments, Legal	Resident Managing Director
Responsible gaming intervention	Responsible Gaming Owner	Compliance Owner	Support, Marketing, Platform Provider	Management
Complaint / ADR escalation	Customer Support and Complaints Owner	Compliance Owner	Legal, Product, Payments	Resident Managing Director

Activity	R	A	C	I
Security incident / DR event	IT Security and Infrastructure Owner	Management Approver	Platform Provider, Compliance, Legal	CGA Reporting Owner
Supplier and certificate evidence	Procurement / Product / QA	Compliance Owner	Platform Provider, IT Security	Management
Training completion	HR / Training Owner	Compliance Owner	Department Owners	Management

Operational Checklists

Checklist Area	Mandatory Checks	Required Evidence
Game / market launch	Supplier approved; certificate recorded; rules/RTP/odds disclosure checked; KYC/RG/payment restrictions tested; reporting extract tested; release approved.	Launch checklist, certificate, QA evidence, release approval.
Game / market disablement	Disable reason recorded; player impact assessed; settlement completed; support script prepared; evidence archived.	Disablement ticket, settlement report, player communication record.
Payment method change	PSP due diligence complete; limits/fees/currencies approved; AML indicators mapped; reconciliation tested; player-facing information updated.	PSP file, payment test report, reconciliation sample.
Withdrawal handling	KYC status checked; same-owner/same-currency principle applied; sanctions/AML alerts reviewed; approval and rejection reasons retained.	Cashier log, KYC evidence, case notes, payout report.
KYC / AML escalation	Customer risk reviewed; sanctions/PEP/adverse-media alerts assessed; source-of-funds requested where needed; unusual transaction reporting considered.	Case file, screening result, EDD record, FIU/goAML evidence where applicable.
Responsible gaming escalation	Trigger identified; account restrictions applied where required; customer contact recorded; marketing suppression checked.	RG case note, limit/exclusion record, suppression test.
Complaint / ADR	Complaint logged; deadline tracked; evidence gathered; decision communicated; ADR escalation provided where required.	Complaint register, response, ADR file.
CGA evidence pack	Manual version matched; source evidence current; screenshots labelled; approvals completed; delivery record retained.	Evidence index, delivery log, management approval.

Exception Handling Guide

Exception	Immediate Handling	Escalation Trigger
Withdrawal blocked or delayed	Payments Owner verifies KYC, wallet, PSP, AML and duplicate-account status.	Escalate to AML/CFT Officer when funds, identity or transaction pattern is suspicious.
KYC failure or mismatch	Support restricts account functions according to platform controls and requests corrected evidence.	Escalate to Compliance for rejection, EDD, ban or reporting decision.
Self-exclusion or vulnerable-player match	Responsible Gaming Owner applies cross-brand restrictions and marketing suppression.	Escalate immediately if gameplay or marketing continued after the flag.
Game settlement dispute	Product and QA compare round/event logs, supplier record and wallet posting.	Escalate to Compliance when player communication, correction or CGA report may be required.
PSP outage or reconciliation break	Finance records outage, blocks affected method if needed and performs exception reconciliation.	Escalate to IT Security / Platform Provider if technical integrity or reporting is affected.
Security incident / data event	IT Security preserves logs, restricts access and starts incident workflow.	Escalate to Compliance, Legal and management for reporting classification.

Exception	Immediate Handling	Escalation Trigger
Reporting extract failure	CGA Reporting Owner preserves failed extract, obtains control totals and requests corrected extract.	Escalate to IT / Platform Provider and record workaround approval.

Operational KPIs

KPI	Target / Standard	Evidence	Owner
KYC completion SLA	Standard cases reviewed within the approved operational SLA.	KYC case report	Compliance / Support
Withdrawal processing	Approved withdrawals processed within published processing times, subject to KYC/AML checks.	Cashier payout report	Payments and Finance
Complaint acknowledgement	Complaints acknowledged and tracked within the complaints procedure deadline.	Complaint register	Support / Compliance
Complaint resolution	Open complaints aged and escalated before deadline breach.	Complaint ageing report	Support / Compliance
RG intervention response	RG triggers reviewed and actioned according to severity.	RG case register	Responsible Gaming Owner
Access review completion	Privileged and production access reviewed at the scheduled frequency.	Access review evidence	IT Security
Reconciliation completion	Wallet, PSP and player-funds reconciliations completed and exceptions tracked.	Reconciliation pack	Finance
Evidence pack freshness	Manual evidence pack refreshed after material change and at scheduled review.	Evidence index	Operations Manual Owner
Supplier review cycle	Critical supplier evidence, certificates and due diligence reviewed on schedule.	Supplier register	Procurement / Compliance

Glossary

Term	Meaning
ADR	Alternative Dispute Resolution process available to players for qualifying unresolved complaints.
AML/CFT/CPF	Anti-money laundering, countering financing of terrorism and counter-proliferation financing controls.
CGA	Curacao Gaming Authority.
CDD / EDD	Customer due diligence / enhanced due diligence.
Critical records	Regulatory records that must remain accessible for inspection, continuity and reporting.
Evidence pack	Controlled repository containing screenshots, logs, reports, approvals and supplier documents supporting the manual.
KYC	Know Your Customer identification and verification controls.
PEP	Politically exposed person.
PSP	Payment service provider or payment method supplier.
RACI	Responsible, Accountable, Consulted and Informed responsibility matrix.
RG	Responsible gaming controls, interventions and player-protection tools.
RNG	Random number generator used in certified games.
RPO / RTO	Recovery point objective / recovery time objective for continuity planning.
SIEM	Security information and event management monitoring capability.

Question	Answer
Where do I find evidence?	Use the Operator compliance evidence repository for operator-owned records and the Platform evidence pack for platform-side supplier, system and integrity evidence.
Can I change a player-facing page without Compliance?	No. Any change to terms, payment information, responsible gaming, complaints, game rules or public licence information must follow change control.
What if a value is not named in the manual?	Use the role title in the manual and retain the exact named owner, delegation or supplier record in the evidence pack.
What factual gaps can remain?	Only an extreme factual item that cannot be evidenced yet and is explicitly accepted by management should remain open.
Who answers platform-side questions?	The Platform Provider or the relevant integrated supplier provides platform, game integrity, KYC tooling, payment integration and reporting evidence where the control is platform-side.
What happens after an incident?	Preserve evidence, restrict impact, classify reporting obligations and update the manual/evidence pack if the incident changes a procedure or control.

1. Document Control and Scope

This Operations Manual records the procedures, systems, controls, records and evidence applied by Interactive Betting N.V. for the operation of FanSport and TopBet. The manual covers sportsbook, live betting, esports, slots, casino, live casino, virtual sports, poker, bingo, TV games, scratch cards, payment operations, customer onboarding, responsible gaming, AML/CFT/CPF controls, technical operations, incident management, complaints and regulatory reporting.

FanSport and TopBet are operated as separate business lines with separate player balances, wallets, settlement records and financial processes. The same control framework, compliance tooling, KYC rules, AML/CFT controls, responsible gaming controls, reporting repository, incident workflow and evidence model are used to maintain consistent regulatory control across the licence.

Role	Named Owner	Operational Responsibility
Resident Managing Director / Local Responsible Person	Resident Managing Director	Local accountability for Curaçao operations, regulatory availability and management sign-off.
Compliance and CGA Reporting Owner	Compliance Officer	Maintains licence evidence, manual versions, CGA submissions and regulatory correspondence.
AML/CFT/CPF Compliance Officer	AML/CFT/CPF Compliance Officer	Owns AML/CFT/CPF policy, risk assessments, unusual transaction review, sanctions screening and FIU/goAML reporting.
Responsible Gaming Owner	Responsible Gaming Owner	Owns player protection tools, interventions, self-exclusion, vulnerable-player controls and RG training.
IT Security and Infrastructure Owner	IT Security and Infrastructure Owner	Owns hosting, application security, access control, logging, disaster recovery and Tier-IV critical-record access.
Payments and Finance Owner	Payments and Finance Owner	Owns PSP controls, reconciliations, segregated funds, payouts, chargebacks and payment evidence.
Customer Support and Complaints Owner	Customer Support and Complaints Owner	Owns complaints workflow, support quality, ADR escalation records and complaint reports.
Manual Owner	Operations Manual Owner	Maintains this manual, evidence pack, change log and approval history.

1.1 Document Status and Change Discipline

This is a controlled operational document. Compliance maintains the master version in the document repository, locks prior approved versions, and retains approval evidence. The manual is reviewed at least annually, at each material operational change, before CGA periodic change submissions, and after any incident or audit finding that affects the procedures described in the manual.

The manual is maintained against the CGA operations-manual template supplied in the application pack. If the CGA publishes or requires a revised template or further rules concerning manual substance, Compliance records the template version, maps each requirement to the manual and updates the manual through the change-control process.

1. The responsible department drafts the change and attaches evidence, screenshots, test reports or supplier records affected by the change.
2. Compliance reviews the change against LOK, CGA licence conditions and CGA policy documents.
3. Legal reviews player-facing terms, dispute provisions, privacy implications and supplier commitments where the change affects these areas.

4. The Resident Managing Director or delegated approver signs the updated version.
5. Compliance archives the superseded version and includes the change in the next amendment report or immediate CGA notification where a critical change is involved.

1.2 CGA Inspection Response Procedure

The Compliance Owner maintains the approved manual and supporting evidence pack in a controlled repository. When the CGA requests inspection of the operations manual, Compliance logs the request immediately and makes the manual, evidence pack, version history, screenshot pack and source records available within five working days.

1. Compliance records the request date, requesting authority, requested scope, deadline, owner and delivery channel in the regulatory-request register.
2. Department owners provide the current evidence files, screenshots, logs, reports, supplier records and approvals referenced by the manual.
3. Compliance verifies that the supplied package corresponds to the approved manual version and that open factual fields are either completed or clearly identified as factual values awaiting confirmation.
4. IT Security confirms secure access, encryption, access logging and transfer integrity for any electronic delivery to the CGA or for any controlled inspection environment.
5. The Resident Managing Director, Compliance Officer or authorised delegate approves the inspection package and records the delivery date, delivery method and evidence reference.

2. Regulatory Reference Matrix

The manual is aligned with the LOK requirements provided with the application file, the current CGA indefinite-term online gaming licence conditions, and the CGA policy documents available through the CGA portal at the verification date. Later CGA publications and binding CGA instructions take priority over older template wording.

Compliance Topic	Legal / Regulatory Basis	Operational Application	Manual Section
Operator and Licence Data	CGA official licence registry	CGA registry entry for Interactive Betting N.V.; licence OGL/2024/537/0691; B2C; company number 142759; effective 24 December 2025; indefinite status.	Sections 3 and 20
Domains and Suppliers	Indefinite-Term Online Gaming Licence Conditions, Articles 2 and 4	Domains are limited to approved domains in the CGA portal; supplier relationships and critical changes are controlled and recorded.	Sections 3, 6 and 19
Safe and Secure Environment	Indefinite-Term Online Gaming Licence Conditions, Articles 6 and 7	Personal data, transactions, gaming equipment and application software are maintained in secure environments with tested systems and current inventories.	Sections 6, 7, 8, 12 and 13
Player Registration and Payments	Indefinite-Term Online Gaming Licence Conditions, Articles 8 and 9	Players register and log in before gambling; payment transactions move through the player account; player funds are segregated; payout currency follows stake currency.	Sections 5 and 10
Game Certification and Disclosure	Indefinite-Term Online Gaming Licence Conditions, Article 10	Games and third-party content are certified by CGA-approved test laboratories and supplier information is maintained.	Sections 4, 6 and 7
Terms, Public Information and CGA Seal	Indefinite-Term Online Gaming Licence Conditions, Articles 11 and 12	Player-facing information includes operator data, rules, odds/RTP, fees, responsible gaming, complaints/ADR and CGA seal.	Sections 9, 14 and 15
Reporting and Tier-IV Access	Indefinite-Term Online Gaming Licence Conditions, Article 13 and LOK Article 5.10	Change, incident, transaction, complaint, ADR and expert reports are produced; critical records remain accessible through a Curaçao Tier-IV server.	Sections 13 and 17
Policies and Procedures	Indefinite-Term Online Gaming Licence Conditions, Article 14	Policies exist for customer verification, player account and funds management, responsible gaming, information security, AML/CFT/CPF and account suspension/closure.	Sections 5, 8, 10, 11 and 14
Operations Manual Requirements	LOK Article 5.9, supplied English requirements PDF	Manual covers games, payments, bet amounts, payouts, software, testing, data storage, visual elements, excluded-person controls, technical infrastructure, restoration, responsible gaming, T&C, disputes and critical digital records.	All sections
Record Keeping and Financial Statements	LOK Articles 5.10 and 5.11	Regulatory reports, operational records and annual financial statements are prepared and retained in auditable form.	Sections 17 and 20

3. Operator, Licence and Brand Inventory

Item	Current Operational Entry
Licence Holder	Interactive Betting N.V.
Company Registration Number	142759
CGA Licence Number	OGL/2024/537/0691
Licence Category	B2C Online Gaming Licence
Licence Status	Indefinite
Licence Effective Date	24 December 2025
Registered Address	Seru Loraweg 17 C, Willemstad, Curaçao
Operational Address	Seru Loraweg 17 C, Willemstad, Curaçao
Resident Managing Director / Local Responsible Person	Resident Managing Director
Primary Compliance Contact	Compliance Contact

3.1 Brand and Domain Inventory

The Operator maintains a controlled inventory of all domains, subdomains, applications, affiliate entrances, mirror domains and white-label skins used for FanSport and TopBet. Compliance verifies the inventory against the CGA portal before launch, after each domain change and during the semi-annual amendment reporting cycle.

Access Point	URL / Identifier	Control
FanSport Main Website	https://fan-sport.cc/	Player-facing web access point; exact approved domain is held in the CGA portal.
FanSport Affiliate Entrance	http://fanpartners.bet	Affiliate or partner entrance used only when approved and recorded.
FanSport Mobile App / PWA	http://mobileapp-fansport.com	Mobile or PWA access point; app build identifiers are kept in the release register.
FanSport Mirror / Campaign Domain	http://fsappconnection.com	Temporary or campaign domains are inactive until CGA approval and internal sign-off.
TopBet Main Website	https://top-bet.com/	Player-facing web access point; exact approved domain is held in the CGA portal.
TopBet Affiliate Entrance	http://top-partners.bet	Affiliate or partner entrance used only when approved and recorded.
TopBet Mobile App / PWA	NA	Mobile or PWA access point; app build identifiers are kept in the release register.
TopBet Mirror / Campaign Domain	http://top-bet.co	Temporary or campaign domains are inactive until CGA approval and internal sign-off.

3.2 Separate Brand Operations with Shared Control Framework

FanSport and TopBet maintain separate business-line ledgers and wallet balances. The separation is reflected in account tagging, wallet identifiers, settlement reports, payment reconciliations, bonus ledgers and management reporting. Shared tools are used only for central control functions: customer verification, sanctions and PEP screening, AMI /CFT

monitoring, responsible gaming controls, exclusion enforcement, duplicate-account detection, incident evidence, regulatory reporting and audit logging.

Where one natural person is identified across both brands, central compliance controls apply across both brands. Self-exclusion, cooling-off, permanent bans, sanctions hits, vulnerable-player flags, marketing suppression and account-closure decisions are enforced across FanSport and TopBet as soon as the match is confirmed by the compliance rules or by manual review.

4. Games Offered and Outcome Determination

The Operator offers the following gaming verticals through its approved player interfaces. Each vertical is mapped to a certified game, platform module, supplier, rules page and settlement logic. Product and Compliance maintain the live game inventory and disable any product that is not covered by the required certification, supplier record, jurisdictional restriction or approved operational rule set.

Vertical	Operational Description	Outcome-Determining Element	Supplier
Sportsbook	Pre-match fixed-odds betting on sports events.	Official event results, sports-data feeds and trading settlement rules.	Platform Provider / integrated suppliers
Live Betting	In-play betting on live events with dynamic odds.	Official event results, live data feed, trading suspension and settlement controls.	Platform Provider / integrated suppliers
Esports	Fixed-odds betting on esports competitions.	Official tournament result, data-provider feed and published market rules.	Platform Provider / integrated suppliers
Slots	RNG-based casino games.	Certified RNG and game math certified by CGA-approved test laboratory.	Platform Provider / integrated suppliers
Casino	RNG table games and other casino products.	Certified RNG, paytable and game rules.	Platform Provider / integrated suppliers
Live Casino	Live dealer games streamed from studios.	Live game rules, studio controls and certified game procedure.	Platform Provider / integrated suppliers
Virtual Sports	RNG or pre-rendered virtual events.	Certified RNG/virtual event engine and published rules.	Platform Provider / integrated suppliers
Poker	Peer-to-peer or platform-hosted poker games.	Game rules, rake schedule, anti-collusion monitoring and settlement logs.	Not applicable unless activated in the Platform Provider product catalogue
Bingo	Number draw games.	Certified RNG/draw procedure and published prize rules.	Not applicable unless activated in the Platform Provider product catalogue
TV Games	Broadcast-style game-show products.	Certified game engine or studio procedure and game rules.	Not applicable unless activated in the Platform Provider product catalogue
Scratch Cards	Instant win games.	Certified RNG, prize table and game rules.	Not applicable unless activated in the Platform Provider product catalogue

4.1 Game Onboarding and Disablement Procedure

1. Product raises a game or market launch request with supplier name, game identifier, jurisdictional availability, game rules, odds/RTP or payout information, certification reference and proposed launch date.
2. Compliance verifies that the supplier and game certification are included in the system register and that the required supplier information is recorded for CGA disclosure.
3. QA tests registration state, KYC restrictions, jurisdictional blocking, age restriction, bet placement, settlement, wallet posting, responsible gaming limits, bonus rules, error handling and reporting extract integrity.
4. IT Security verifies that the game integration uses approved API credentials, encrypted transport, logging, monitoring and least-privilege access.
5. The product is enabled only after Product, Compliance, IT Security and Finance sign the launch checklist.
6. The game is disabled immediately when certification is not current, a supplier issue creates integrity risk, a serious incident affects settlement, or Compliance directs removal due to regulatory or responsible-gaming reasons.

4.2 Game Rules, Odds, RTP and Player Information

The player interface displays or links to the applicable game rules before play. Sports betting markets display event, market, odds, stake, potential payout and settlement rules. Casino and RNG products display game rules, payable or RTP information where applicable, game cost and any special feature rules. Bonus terms are separate from base game rules and are not used to obscure the cost or mechanics of a game.

4.3 Platform Sportsbook Bet Types and Casino Coverage

The Platform Provider response is incorporated as the operational evidence source for product coverage, bet-type availability and outcome-determination controls. Product availability remains subject to licence scope, supplier certification, brand configuration and the approved platform/back-office limits register.

Platform Detail	Integrated Operational Treatment
Sportsbook bet types	Single bets, accumulators, system bets, chains, advancebets, multibets, conditional bets, anti-accumulators, Lucky bets and Patent bets are supported where enabled by the Platform Provider and permitted for the relevant market. Related-outcome and incompatible-market restrictions are enforced through trading rules and settlement controls.
System and combination limits	System-bet combinations are controlled by platform limits, including the platform maximum of 184,756 accumulator combinations where that configuration is enabled. The approved value set is retained in the Platform evidence pack and the back-office limits register.
Casino and RNG game coverage	The platform response identifies slot machines, blackjack, roulette, video poker and live dealer games as game-of-chance categories. The manual applies these categories under the broader casino, live casino and RNG product controls in Sections 4, 6 and 7.
Outcome determination	Sportsbook outcomes are settled using official results, sports-data feeds, trading settlement rules and supplier logs. Casino outcomes are determined by certified RNG outputs or live-dealer rules, with game-round records retained for dispute, audit and CGA evidence purposes.

5. Payments, Player Funds, Bet Amounts, Payouts and Wallet Controls

All payment transactions between a player and the Operator are recorded through the player account. The platform maintains distinct ledger entries for cash balance, bonus balance, locked bonus funds, pending withdrawals, void/refund adjustments, chargebacks, reversals and manual corrections. FanSport and TopBet wallets are separate and the brand identifier is stored on each transaction record.

5.1 Payment Methods and Operational Limits

Method	Provider	Min Dep.	Max Dep.	Min Wdr.	Max Wdr.	Processing Time
Bank Cards	Visa/Mastercard; Platform Provider / integrated card PSPs	USD 5 or equivalent	USD 2,000 or equivalent	USD 5 or equivalent	USD 2,000 or equivalent	Up to 24 hours after approval
Electronic Wallets	Jeton, Sticpay, PayDo, ByBit, MoneyGo, Piastrix, Neteller; Platform Provider / integrated PSPs	EUR 10 or equivalent	EUR 2,000 or equivalent	EUR 10 or equivalent	EUR 2,000 or equivalent	Up to 24 hours after approval
Bank Transfers	SEPA bank transfer; Platform Provider / integrated bank-transfer providers	EUR 10 or equivalent	EUR 2,000 or equivalent	EUR 10 or equivalent	EUR 2,000 or equivalent	1-3 business days after approval
Mobile Money / Mobile Commerce	Platform Provider / integrated mobile-money providers	USD 0.50 or equivalent	USD 1,000 or equivalent	USD 0.50 or equivalent	USD 1,000 or equivalent	Up to 24 hours after approval
Cryptocurrencies	Bitcoin, Ethereum, TRON, Dogecoin, XRP and Binance Coin BSC; Platform Provider / integrated crypto processor(s)	USD 1 equivalent	USD 10,000 equivalent	USD 1 equivalent	USD 10,000 equivalent	Up to 24 hours after blockchain confirmation and approval

5.2 Bet Amounts, Payout Limits and Settlement Rules

Product	Minimum Bet	Maximum Bet	Payout Limit	Settlement Rules
Sportsbook	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Markets settle on official result feeds and published market rules. Obvious error, void, postponed, abandoned and dead-heat rules are applied through the sportsbook settlement engine and audit log.
Live Betting	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	In-play markets settle on live-data and official result confirmation. Suspended markets reject new bets. Bets accepted before suspension are settled according to published live betting rules.
Esports	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Markets settle on official tournament or game result and published esports rules. Match integrity and suspicious-betting flags trigger risk review.

Product	Minimum Bet	Maximum Bet	Payout Limit	Settlement Rules
Slots	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Game outcomes and payouts are determined by certified game math and RNG. Game round ID, stake, win, currency and balance movement are logged.
Casino	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	RNG table and casino games settle according to certified rules and paytables. Interrupted rounds are reconciled with supplier game-round logs.
Live Casino	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Live dealer outcomes are recorded by supplier studio systems and settled according to game rules. Disputed rounds are escalated with round/video/provider evidence.
Virtual Sports	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Configured in platform/back-office limits register	Virtual events settle through certified event engine results and published market rules.
Poker	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Poker settlements use table/tournament records, rake schedule and anti-collusion monitoring. Voids and refunds require approval and audit evidence.
Bingo	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Bingo draw and prize allocation are generated by the certified draw engine and published rules.
TV Games	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	TV game outcomes settle under the supplier-certified procedure and game rules.
Scratch Cards	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Not applicable unless activated in the Platform Provider product catalogue	Instant game outcomes and prize tables are recorded by the certified game engine.

5.3 Player Funds and Segregation Procedure

1. Every deposit creates a player-account ledger entry with player ID, brand, payment method, provider reference, currency, amount, status, timestamp and AML risk status.
2. Player funds are held separately from operating funds through designated segregated accounts and internal ring-fencing records. Finance reviews the segregated-funds position against total player liability daily.
3. The platform does not provide credit gambling. Stakes are accepted only when the player cash balance or eligible bonus balance is sufficient at the moment of bet acceptance.
4. Payouts are processed to the same player account and, where supported, the same currency and payment route used for deposit or gameplay. Exceptions are approved by Payments and Compliance with evidence.

5. Manual adjustments require a reason code, supporting record, maker-checker approval, audit log and daily finance review. High-value adjustments require Compliance review before release.
6. Voids, refunds and reversals are posted through controlled transaction types that preserve the original transaction, reason, approval, operator ID and timestamp.
7. Finance reconciles PSP statements, blockchain confirmations, sportsbook settlements, casino game-round reports and wallet ledger movements each business day.

5.4 Bonus Balance and Bonus Conversion Controls

Bonus funds are maintained separately from cash balance. Bonus award, wagering progress, expiry, forfeiture, conversion to cash and cancellation are stored as auditable ledger events. Bonus funds are not used to mask the true balance available for withdrawal. Withdrawable funds remain visible to players and withdrawal restrictions are limited to the published bonus terms and applicable risk controls.

5.5 Platform Payment-Route and Withdrawal Controls

The following platform-side payment controls are applied together with the Operator's AML/CFT, KYC, player-funds and wallet controls. Where a PSP-specific rule is more restrictive than the generic rule, the more restrictive operational control is applied and retained with the payment evidence file.

Control	Operational Requirement
PSP operation	Payment processing is performed through integrated PSPs operating under merchant or platform agreements. Deposit and withdrawal channels are available subject to service availability, risk controls, country restrictions, KYC/AML checks and published processing times.
Same-owner and same-route withdrawals	Deposits and withdrawals must use payment details belonging to the player account holder. Withdrawals are routed to the same payment instrument or payment route used for deposit where technically available. If several deposit routes were used, payout allocation is proportionate or follows an approved compliance alternative when the original route cannot be used.
E-payment to cash restriction	Where deposits were made through electronic payment systems, cash-withdrawal requests are declined unless an approved alternative process is documented and legally permitted.
Wagering-before-withdrawal control	Before withdrawal, the platform may require the player to place qualifying stakes at least equal to the deposit amount, with qualifying odds of at least 1.1. Opposite bets, minimal-risk bets or other transactions designed to avoid genuine gameplay are excluded from the qualifying calculation and may trigger account review.
Misuse and verification holds	Withdrawals are blocked or delayed when payment ownership, identity, bonus abuse, chargeback risk, duplicate-account risk, unusual transaction behaviour or other account misuse requires verification. The hold reason, reviewer and final decision are retained in the payments or compliance evidence file.

6. Software, Supplier and System Register

The Operator maintains an up-to-date inventory of gaming equipment, application software, gambling interfaces, games, suppliers and critical service providers. Supplier onboarding is approved before use, and the relevant supplier information is recorded for CGA portal disclosure where required.

Service	Supplier	Criticality	Licence / Register Status	Owner	C
PAM / Back Office / Account System	Platform Provider	Critical	Recorded in Platform evidence pack	Business / Compliance Owner	Operator compliance evidence repository / Platform evidence pack
Sportsbook and Trading	Platform Provider / integrated sportsbook suppliers	Critical	Recorded in Platform evidence pack	Product / Compliance Owner	Operator compliance evidence repository / Platform evidence pack
Casino Aggregator	Platform Provider / integrated casino suppliers	Critical	Recorded in Platform evidence pack	Product / Compliance Owner	Operator compliance evidence repository / Platform evidence pack
Live Casino	Platform Provider / integrated live casino suppliers	Critical	Recorded in Platform evidence pack	Product / Compliance Owner	Operator compliance evidence repository / Platform evidence pack
RNG / Virtual Sports / Instant Games	Platform Provider / integrated RNG and game suppliers	Critical	Platform evidence pack	Product / QA Owner	Platform evidence pack
KYC / AML / Sanctions / PEP Screening	Platform Provider / integrated KYC and AML providers	Critical	Recorded in Platform evidence pack	AML/CFT/CPF Compliance Officer	Operator compliance evidence repository / Platform evidence pack
Card PSP / E-Wallet PSP	Platform Provider / integrated PSPs	Critical	Recorded in Platform evidence pack	Payments and Finance Owner	Operator compliance evidence repository / Platform evidence pack
Crypto Processor	Platform Provider / integrated crypto processor(s)	High	Recorded in Platform evidence pack	Payments and Finance Owner	Operator compliance evidence repository / Platform evidence pack
Primary Production Data Centre / Hosting	Platform Provider Main DataCenter, Amsterdam	Critical	Platform evidence pack	IT Security and Infrastructure Owner	Platform evidence pack
Curaçao Tier-IV Critical Records Data Centre	Platform Provider Backup and DR / Curaçao critical-records environment	Critical	Platform evidence pack	IT Security and Infrastructure Owner	Platform evidence pack

Service	Supplier	Criticality	Licence / Register Status	Owner	C
CDN / WAF / DDoS Protection	CDN, DNS and AntiDDoS services used by Platform Provider	High	Recorded in Platform evidence pack	IT Security and Infrastructure Owner	Platform evidence pack
Support / Ticketing	Platform Provider / Operator support tools	High	Recorded in Platform evidence pack	Customer Support Owner	Operator compliance evidence repository / Platform evidence pack
Alternative Dispute Resolution	ADR provider identified in the published Complaints and ADR Policy	High	Recorded in Operator compliance evidence repository	Customer Support and Complaints Owner	Operator compliance evidence repository

6.1 Supplier Onboarding and Oversight Procedure

1. Procurement opens a supplier file containing corporate details, service description, criticality assessment, contract, SLA, data processing terms, subcontractor information and termination provisions.
2. Compliance determines whether the supplier relationship requires CGA prior approval or CGA portal disclosure before the supplier is used in production.
3. IT Security assesses system access, API permissions, data flows, encryption, incident notification commitments, business continuity commitments, vulnerability management and audit evidence.
4. Legal reviews contract terms, jurisdiction, confidentiality, data protection, regulatory access, audit rights, complaint support and data-return obligations on termination.
5. The supplier is added to the system register only after Procurement, Legal, Compliance, IT Security and the business owner approve the file.
6. The business owner performs annual supplier review and immediate review after critical incidents, certification expiry, material service change, ownership change or regulator request.

7. Periodic Test Methods and Quality Monitoring

The Operator operates a recurring quality-monitoring programme that covers game integrity, sportsbook settlement, wallet accuracy, player registration, KYC/AML controls, responsible gaming controls, information security, backup restoration and regulatory reporting extracts.

Frequency	Test Method	Scope	Owner	Evidence
Daily	Operational health checks	Login, registration availability, cashier availability, bet placement, game launch, wallet posting, support channel availability, CGA seal visibility.	Operations / IT	Daily checklist and incident ticket references.
Daily	Wallet and payment reconciliation	PSP statements, pending deposits, pending withdrawals, chargebacks, crypto confirmations, manual adjustments and player liability balance.	Finance / Payments	Daily reconciliation report and approval record.
Weekly	Game and sportsbook settlement sampling	Sampling of game rounds, sportsbook settlements, voids, refunds, odds acceptance, game rules and payout calculations.	Product / Risk / QA	QA sample report and exceptions log.
Weekly	Responsible gaming and exclusion control test	Self-exclusion, cooling-off, deposit limit, loss limit, marketing suppression and cross-brand block enforcement.	Responsible Gaming / QA	RG control test report.
Monthly	Access review and privileged activity review	Admin users, role changes, MFA status, privileged actions, failed logins and terminated users.	IT Security / Compliance	Access review report and remediation evidence.
Monthly	AML/CFT monitoring sample	KYC completion, sanctions/PEP alerts, duplicate accounts, high-risk players, unusual transaction reviews and EDD files.	AML/CFT Officer	AML sampling report and case-file references.
Quarterly	Backup restoration test	Restoration of representative database, wallet ledger export, game transaction sample and critical-record archive.	IT Infrastructure	Restore test report with RTO/RPO results.
Quarterly	Vulnerability assessment	Authenticated and external vulnerability scan of internet-facing services and critical internal components.	Independent security testing provider	Operator compliance evidence repository
Semi-Annual	Manual and regulatory evidence review	Operations manual, supplier register, domain register, screenshot pack, policy URLs, CGA report archive and change log.	Compliance	Semi-annual compliance review report.
Annual	Penetration test	Application, API, infrastructure and access control testing by an independent qualified entity.	Independent penetration testing provider	Operator compliance evidence repository

Frequency	Test Method	Scope	Owner	Evidence
Annual / On Change	Game, RNG and sportsbook certification	Game math, RNG, sportsbook system, live casino procedure and platform integrity certifications.	Platform Provider / integrated suppliers' approved test laboratories	Platform evidence pack
Annual	Disaster recovery exercise	Failover, restoration, data reconciliation, communications and management approval workflow.	IT / Operations / Compliance	DR exercise report and action plan.

7.1 Defect Management

1. Each failed test creates a ticket with severity, affected brand, affected player group, regulatory impact, owner, due date and evidence requirements.
2. Critical defects that affect game integrity, player funds, data security, access to player records, excluded-person controls or complaint/ADR records are escalated immediately to Compliance and IT Security.
3. Release to production is blocked where an unresolved defect affects game fairness, player account balances, KYC/AML enforcement, self-exclusion, CGA reporting or information security.
4. The closure record includes test evidence, approval, date of fix, residual risk assessment and any CGA reporting decision.

7.2 Platform RNG, Certification and Statistical Test Evidence

The Platform Provider and integrated game suppliers retain certification and test evidence for RNG products, sportsbook settlement logic, game integrations and material platform changes. Supplier-specific certificates and laboratory reports prevail where they provide more precise implementation detail than the generic platform response.

Evidence Area	Platform Response Integrated in Manual
RNG implementation evidence	The platform response refers to RNG implementations and entropy sources such as Mersenne Twister, Fortuna and hardware-based entropy. The applicable implementation for each game is confirmed through the supplier certificate, game approval file and Platform evidence pack.
Applicable standards	RNG and game-integrity evidence is mapped to recognised standards where applicable, including ISO/IEC 18031, GLI-11 and GLI-19, plus any equivalent standard stated in supplier certificates.
Statistical testing	Periodic or certification-stage testing may include Frequency Tests, Runs Tests, Autocorrelation Tests, Chi-Square Goodness-of-Fit Tests and Entropy Measurement. Test reports are retained as supplier or platform evidence.
Independent certification	Certificates may be issued by eCOGRA, iTech Labs, Gaming Laboratories International, BMM Testlabs or another recognised testing laboratory accepted for the relevant product and jurisdiction.
Source, seed and release control	Source-code review, seed-management controls, change logging, release approval and post-release monitoring are retained for relevant platform, RNG and game-supplier changes.

8. Data Storage, Retention, Security and Access Control

Operational, player, gaming, financial, KYC/AML, support and audit data are stored in access-controlled production systems and replicated to controlled reporting repositories. Sensitive data is encrypted in transit and at rest. Administrative access uses named user accounts, MFA, role-based access control, least privilege, approved provisioning, periodic access review and tamper-evident audit logging.

8.1 Data Map and Retention Schedule

Data Class	Data Elements	Storage Location	Retention	Controls
Player Profile and Account	Player ID, personal details, account status, brand, preferences, consent, marketing opt-in/out, account history.	Primary production database, Platform Provider Main DataCenter, Amsterdam; reporting repository; Curacao critical-records repository.	At least 5 years after account closure or longer under legal hold, complaint, AML/CFT review or regulator request.	RBAC, MFA, encryption, audit logs.
KYC / CDD / EDD	Identity documents, age verification, screening results, risk score, EDD records, sanctions/PEP/adverse media checks.	KYC/AML case-management repository and encrypted document store; status indicators replicated to Curacao critical-records repository.	At least 5 years after relationship ends or longer under AML/CFT investigation or legal hold.	Restricted Compliance access, encryption, case logs.
Game and Betting Transactions	Bet ID, game round ID, market, odds, stake, win, settlement, void/refund status, timestamps, supplier references.	Game transaction databases, supplier logs and reporting repository; required transaction records replicated to Curacao critical-records repository.	At least 5 years from transaction date or longer where required for complaint, audit, tax/accounting or regulator request.	Immutable event logs, checksum totals, reconciliation reports.
Financial Transactions and Wallet Ledger	Deposits, withdrawals, refunds, reversals, chargebacks, PSP reference, crypto hash, balance movements.	Wallet ledger, payment repository and finance reconciliation archive; deposits, withdrawals, balances and settlement records replicated to Curacao critical-records repository.	At least 5 years from transaction date; accounting records retained for 10 years.	Segregated access, maker-checker, audit trail, reconciliation evidence.
Responsible Gaming and Exclusion Records	Deposit/loss/session limits, cooling-off, self-exclusion, interventions, cross-brand blocks, marketing suppression.	Responsible-gaming control database and compliance case repository; active restrictions and exclusions replicated to Curacao critical-records repository.	At least 5 years after the end of exclusion or account closure; lifetime exclusions retained as active suppression records.	Restricted Compliance/RG access, audit log, cross-brand matching.
Support, Complaints and ADR	Tickets, chat/email transcripts, complaint forms, evidence, investigation notes, final decisions, ADR files.	Ticketing platform and complaints repository; complaint/ADR references and reportable evidence indexes replicated to Curacao critical-records repository.	At least 5 years after final resolution or longer if ADR, legal hold or regulator request applies.	Role-based support/compliance access, case status logs.
Security and Audit Logs	Admin actions, privileged access, API calls, failed logins, change logs, incident evidence, vulnerability and restore tests.	SIEM/log archive, ticketing and evidence repository; critical access, replication and integrity audit logs retained in Curacao critical-records environment.	At least 2 years for security logs and 5 years for regulatory evidence; extended where incident/legal hold applies.	Tamper-evident logs, restricted access, time synchronisation.
CGA Reporting Datasets	Player transaction report extracts, complaint/ADR reports, incident reports, change reports, evidence attachments.	Reporting repository and Curacao Tier-IV Critical Records Server / repository accessible to CGA.	Retained according to regulatory reporting archive schedule; at least 5 years.	Encrypted replication, integrity checks, access logs.

8.2 Encryption, Access and Logging Procedure

1. All player-facing and administrative interfaces use encrypted transport. Legacy or weak protocol versions are disabled in the WAF/load-balancer configuration.
2. Production databases, backups, evidence archives and document stores are encrypted at rest. Encryption keys are restricted to IT Security and protected through access-control and rotation procedures.
3. User access is provisioned from an approved ticket that identifies role, business need, data scope, approving manager and expiry date where temporary access is used.
4. Privileged access uses MFA and named accounts. Shared accounts are not used for operational administration except controlled emergency break-glass accounts with sealed credentials and post-use review.
5. IT Security performs monthly review of privileged accounts, terminated users, dormant accounts, failed logins and high-risk actions. Findings are recorded and remediated.
6. Audit logs are retained in the central log repository and linked to incident, access review and regulatory evidence where relevant.

8.3 Data Export and Pseudonymous Regulatory Reporting

Regulatory extracts use the player unique identifier, transaction identifier, brand identifier and timestamp controls required for traceability. Where a report can be produced with pseudonymous identifiers, the report uses pseudonymous unique identifiers and the re-identification key remains under restricted Compliance and IT Security control. Full identity data is made available only where lawful and required for regulatory, AML/CFT, complaint, ADR, law-enforcement or court purposes.

9. Player-Facing Visual Elements and Screen Evidence

The Operator maintains current screen evidence for all player-facing interfaces, including desktop and mobile/PWA views. The screen evidence demonstrates that licence information, CGA seal, age prohibition, responsible gaming controls, rules, complaints/ADR, support contacts, deposits, withdrawals, KYC and player account functions are presented to players.

9.1 Screen Evidence Inventory Procedure

1. Product captures screenshot evidence for each brand and each material interface after launch, after a UI release, after policy-link changes and during the semi-annual compliance review.
2. Compliance reviews the screenshots for mandatory public information, footer links, CGA seal, age restriction, responsible gaming content, terms access, complaints/ADR access and support contacts.
3. IT or Product stores screenshots in the evidence repository using brand, page, device, language, date, environment and version naming convention.
4. Outdated screenshots are archived with the prior manual version and not deleted from the evidence pack.

9.2 Representative Screenshot Evidence

Representative player-facing screenshot evidence is maintained in Appendix A. The appendix pairs FanSport and TopBet evidence for each required interface, including the cashier withdrawal screenshots inserted for item 7.

10. Customer Identification, KYC and AML/CFT Controls

The Operator applies KYC, customer due diligence, ongoing monitoring and AML/CFT/CPF controls before and during the customer relationship. The procedures below are enforced across FanSport and TopBet through the shared compliance-control framework.

10.1 Registration and Age Verification Procedure

1. The player registers using mandatory personal information, contact information, date of birth, country of residence, preferred currency and acceptance of the current Terms and Conditions and Privacy Policy.
2. The platform prevents account use where the date of birth indicates that the person is below the permitted age or where mandatory information is incomplete.
3. Identity and age verification are completed using government-issued identity documents and electronic verification tools. The player account remains subject to restrictions until verification requirements are satisfied.
4. Before first withdrawal and whenever the risk model requires it, the player supplies additional documents or information required to validate identity, source of funds, payment ownership or account activity.
5. KYC failures, suspected document manipulation, identity mismatch, sanctions hit, duplicate-account match or other integrity flags are escalated to Compliance before deposits, betting or withdrawals continue.

10.2 Duplicate Account and Linked Account Detection

The platform identifies duplicate or linked accounts using combinations of full name, date of birth, email, phone number, identity document, address, payment instrument, IP address, device fingerprint, cookie/device data, login patterns and wallet/payment references. Confirmed duplicate or linked accounts are reviewed by Compliance, and restrictions are applied across both FanSport and TopBet where the same person is identified.

10.3 AML/CFT/CPF Risk-Based Monitoring Procedure

1. The AML/CFT Officer maintains the business risk assessment and customer risk methodology. The methodology considers geography, product, payment method, transaction behaviour, delivery channel, PEP/sanctions exposure, source of funds, duplicate accounts and adverse media.
2. Players are screened against sanctions, PEP and adverse-media sources at onboarding and on an ongoing basis. The sanctions screening control runs before withdrawals and when relevant data changes.
3. Risk-scoring rules identify high-value activity, unusual deposits/withdrawals, rapid in-out activity, payment-instrument mismatch, structuring, chargeback patterns, inconsistent source of funds, suspicious bonus abuse and known fraud indicators.
4. Enhanced due diligence is applied to PEPs, high-risk jurisdictions, unusual activity, high-value players, crypto risk indicators and cases escalated by Payments, Support, Responsible Gaming or Risk.
5. Unusual transaction cases are documented in the AML case-management repository. Where the legal reporting threshold or suspicion standard is met, the AML/CFT Officer files the report through the FIU/goAML process without delay and preserves the case file.
6. Where a sanctions match is confirmed, the Operator freezes the account or assets without delay, blocks withdrawals, records the basis for the decision and follows the applicable reporting procedure.

10.4 AML/CFT Training and Assurance

Customer-facing teams, payments staff, AML reviewers, risk analysts, VIP/CRM staff, compliance staff and relevant management receive annual AML/CFT training and role-specific refreshers. Training covers red flags, sanctions/PEP screening, unusual transaction escalation, source-of-funds review, crypto indicators, record keeping, tipping-off restrictions and FIU/goAML reporting.

10.5 Platform Access, Location and Session Integrity Controls

The platform response confirms additional controls used to prevent underage, restricted-country, duplicate-account and unauthorised participation. These controls operate together with the Operator's KYC, AML/CFT, responsible-gaming and account-integrity procedures.

Control Area	Integrated Control
Age and identity gate	Date of birth, 18+ acknowledgement and automated eligibility checks are applied during registration. Document verification is completed at registration, before first withdrawal or when the risk model requires enhanced verification.
Geo and restricted-country controls	Geo-IP checks, country restriction lists and dynamic country bans are applied at registration, login and transaction points where technically available. Restricted-country matches are blocked or escalated according to the compliance decision.
VPN, proxy and Tor detection	VPN, proxy, Tor, hosting-provider IP ranges and unusual location changes are treated as risk indicators. Confirmed circumvention attempts can trigger account restriction, KYC review, withdrawal hold or closure.
Account and device uniqueness	Duplicate or linked accounts are detected through identity data, email, phone, payment instruments, IP address, cookies, device fingerprinting, login patterns and wallet/payment references.
Authentication and session controls	Email or phone OTP, optional or risk-based MFA, failed-login monitoring, account lockout, CAPTCHA, new-device or new-location alerts, one-active-session controls where configured and automatic session timeout protect account access.
Behavioural and payment-risk monitoring	Transaction velocity controls, known fraudulent BIN indicators, rapid deposit/withdrawal behaviour, inconsistent payment ownership and other behavioural alerts are routed to Payments, Risk, AML/CFT or Compliance for review.

11. Banned, Excluded and Vulnerable Persons Controls

The Operator prevents self-excluded, banned, underage, sanctioned, vulnerable or otherwise restricted persons from accessing gambling services. These controls apply across FanSport and TopBet through the shared compliance and responsible-gaming database.

11.1 Exclusion, Cooling-Off and Ban Enforcement Procedure

1. Player-initiated cooling-off and self-exclusion requests are available through the Responsible Gaming area and customer support. The request is logged with brand, player ID, period, timestamp, channel and confirmation status.
2. Self-exclusion is applied immediately to gambling activities under the licence. The player cannot deposit, place bets, receive bonuses, join VIP activity or receive marketing during the exclusion period.
3. The player retains controlled access required to withdraw remaining funds, subject to KYC, AML/CFT and fraud checks.
4. Available self-exclusion periods are 1 year, 3 years, 5 years, 10 years and lifetime. Cooling-off periods are configured as short-term breaks through the Responsible Gaming controls.
5. The exclusion flag is stored centrally and is enforced across FanSport and TopBet. Duplicate or linked accounts are blocked when a match is confirmed.
6. Reactivation after the end of a time-limited exclusion is handled only through the controlled reactivation procedure. The Operator does not initiate reactivation marketing or incentives.
7. Operator-imposed bans for fraud, sanctions, chargeback abuse, underage play, AML/CFT risk, responsible-gaming risk or terms breaches are recorded with reason code, evidence and review owner.

11.2 Vulnerable-Player Monitoring and Intervention

Responsible Gaming and Compliance monitor behavioural markers including rapid increase in deposits, repeated failed deposits, chasing losses, long sessions, late-night activity, repeated limit changes, withdrawal cancellations, complaints indicating distress, self-declared vulnerability and support interactions. Interventions include safer-gambling messaging, limit recommendations, temporary restrictions, self-assessment prompts, cooling-off, self-exclusion guidance, account review and permanent exclusion where required.

11.3 Detailed Platform Cooling-Off, Self-Exclusion and Support Controls

The Platform Provider response is incorporated into the Operator's responsible-gaming and exclusion controls. The operational rule is that the most protective applicable restriction prevails across FanSport and TopBet.

Control	Platform Response Integrated in Manual
Cooling-off periods	Cooling-off may be offered for 24 hours, 7 days, 1 month or 3 months. During the selected period the player cannot deposit, place bets or participate in promotions. Controlled account access remains available for withdrawal of remaining funds subject to KYC, AML/CFT and fraud checks. The account is restored automatically after the period expires unless another restriction applies.
Self-exclusion effect	Self-exclusion blocks gambling, deposits, bonuses, promotions, VIP activity, marketing and creation of new accounts for the selected period. Available periods are 1 year, 3 years, 5 years, 10 years and lifetime.
Reactivation and circumvention	Self-exclusion is irrevocable during the selected period. Reactivation after expiry requires a written request and responsible-gaming review. Attempting to create or use another account during exclusion is treated as a terms breach and may lead to permanent ban or confiscation action where permitted.
Open participation and jackpot handling	Open wagers, tournament participation and progressive-jackpot contributions are handled according to published product rules and supplier settlement records. No new participation is permitted after the exclusion takes effect.
Support resources	Responsible-gaming information may reference external blocking or support resources identified in the platform response, including BetBlocker, GamBlock, Gamban, Gamblers Anonymous, Gambling Therapy, GamCare and GambleAware, where available and appropriate for the target market.

12. Technical Infrastructure and Restoration

The technical infrastructure is based on the architecture provided by Platform Provider. Player-facing services operate from the Platform Provider Main DataCenter in Amsterdam, including front-end, web, cache, business-logic, database, analytics, security and backup/DR services. The architecture uses CDN, DNS and AntiDDoS services and integrates data providers and partner API services. Backup, disaster-recovery and critical-records functions are maintained through the Curaçao Backup and DR / critical-records environment according to the Platform evidence pack.

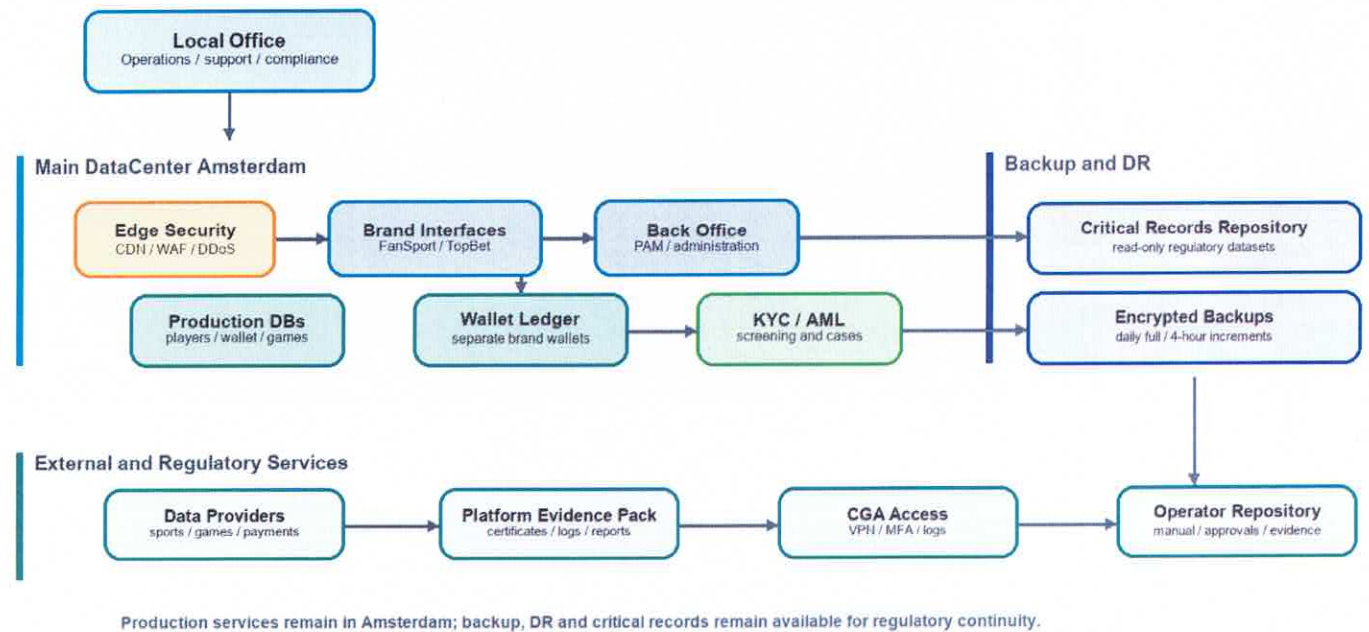


Figure 1. Platform Provider technical infrastructure and recovery model, as provided in the platform response.

12.1 Infrastructure Register

Component	Operational Entry	Purpose
Primary Production Data Centre	Platform Provider Main DataCenter, Amsterdam	Player-facing web/API, applications, production databases, integrations, monitoring and backups.
Database Layer	Platform Provider database layer (Postgres/MySQL, production databases, wallet, KYC, RG, support and reporting data stores)	Player, wallet, transaction, KYC, RG, support and reporting data stores in the primary data centre.
Curaçao Tier-IV Critical Records Data Centre	Platform Provider Backup and DR / Curaçao critical-records environment	Separate regulatory data-centre environment for the Critical Records Server / CGA-access repository.
Critical Records Server Hardware	Server hardware and capacity maintained by Platform Provider in the Platform evidence pack	Hosts replicated critical records, integrity reports, access logs and CGA access services in Curaçao.
Encrypted Replication Channel	Encrypted replication between primary production systems and the Curaçao Backup and DR / critical-records environment	Encrypted CDC and reporting datasets with integrity checks, sequence controls and exception alerts.
Network Security	CDN, DNS and AntiDDoS services used by Platform Provider	TLS, CDN/WAF/DDoS, traffic filtering, logging and CGA-access network controls.
Monitoring and Incident Tooling	Platform Provider monitoring and ticketing tools	Availability, performance, replication monitoring, data-centre status and incident workflow.

12.2 Backup, Failover and Restoration Procedure

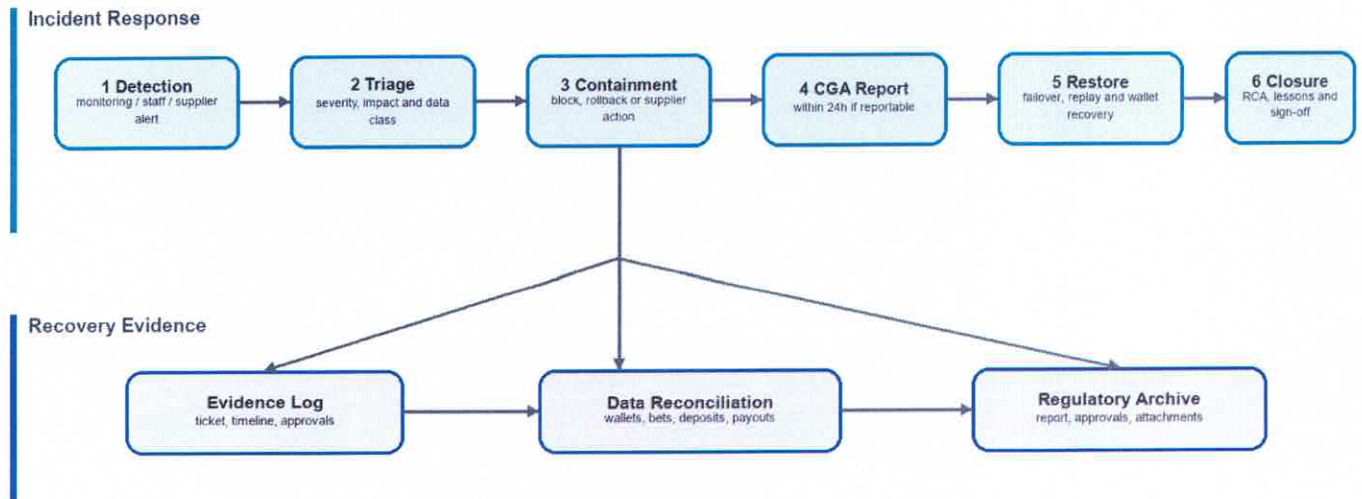
The restoration model uses encrypted backups, controlled failover, transaction reconciliation and management approval. Recovery targets are applied by system criticality. Player wallets, payment records, game transactions and responsible-gaming records are treated as critical records. Production recovery is executed in the primary production environment, while the Curaçao Tier-IV critical-records repository is restored and re-synchronised as a regulatory evidence and CGA-access environment.

System Class	Recovery Time Objective	Recovery Point Objective	Restoration Method
Player-Facing Application Availability	RTO 4 hours	RPO 15 minutes	Traffic reroute, application redeploy and configuration restoration from approved release artefacts.
Wallet Ledger and Financial Transactions	RTO 4 hours	RPO 15 minutes	Database recovery, ledger replay, PSP reconciliation and maker-checker approval before normal withdrawals resume.
Game and Betting Transactions	RTO 4 hours	RPO 15 minutes	Supplier logs and internal transaction logs reconcile accepted bets, unsettled bets, interrupted rounds and result postings.
KYC / AML / Responsible Gaming Records	RTO 8 hours	RPO 1 hour	Compliance records restore before full player access resumes where restrictions, exclusions or sanctions controls may be affected.
Support and Complaints Records	RTO 24 hours	RPO 4 hours	Ticket history and attachments restore from encrypted backup and reporting extracts.
Curaçao Critical-Records Replication	RTO 4 hours	RPO 15 minutes	Replication queue replay from the primary production data centre into the Curaçao Tier-IV Critical Records Server / repository, followed by integrity totals and access-log verification.

1. Monitoring or staff detection opens an incident ticket and assigns severity, affected brand, affected system, regulatory impact and incident manager.
2. IT isolates the affected service, preserves logs and evidence, and activates supplier support where the incident involves third-party systems.
3. Management approves failover where the primary service cannot be restored within the applicable RTO or where integrity risk requires controlled rollback.
4. Database restoration uses the latest valid encrypted backup plus replay of transaction logs or supplier settlement records. Checksums, sequence numbers and record counts verify completeness.
5. Finance and Operations reconcile player balances, bets, game rounds, deposits, withdrawals, refunds and manual adjustments before unrestricted service resumes.
6. Compliance determines whether the incident is reportable to CGA and prepares the 24-hour report where applicable.
7. After recovery, IT and Compliance complete a root-cause analysis, corrective action plan and evidence archive.

12.3 Post-Recovery Reconciliation

Post-recovery reconciliation compares internal wallet balances, transaction journals, PSP settlement statements, blockchain confirmations, sportsbook accepted-bet logs, casino game-round logs, supplier settlement files, manual adjustment records and player complaint tickets. Any imbalance is locked from withdrawal and escalated to Finance, Product, Compliance and the relevant supplier until corrected with an auditable adjustment.

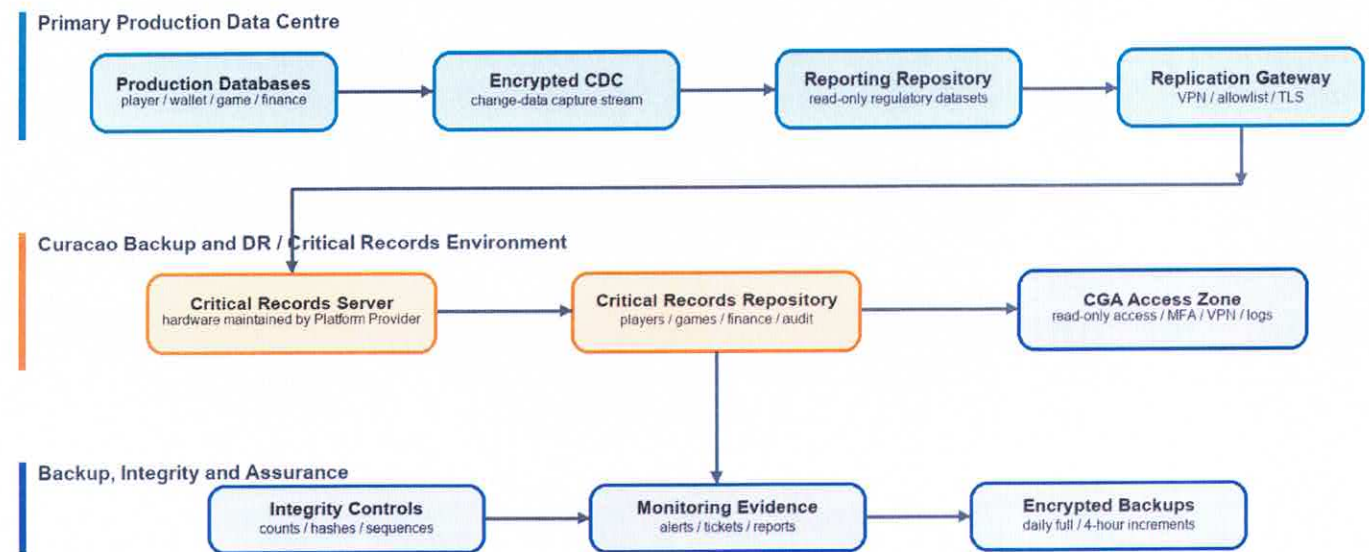


Severity, impact, data class and recovery decisions are logged end-to-end.

Figure 2. Incident reporting and restoration workflow.

13. Curaçao Tier-IV Critical Records and CGA Access

The Operator maintains critical information about players, game transactions and financial transactions through a dedicated Critical Records Server / repository hosted in a Tier-IV certified data centre located in Curaçao. The Curaçao environment is separate from the primary production data centre and is designed for regulatory accessibility, traceability, integrity verification and continuity of evidence. It receives encrypted replication from the production and reporting repositories and provides controlled read-only CGA access to the required critical records.



The Curaçao repository is regulatory and read-only; player-facing production remains separate.

Figure 3. Critical records data-centre replication and CGA accessibility model.

13.1 Critical-Records Implementation

Control Area	Operational Implementation
Primary Production Data Centre	Platform Provider Main DataCenter, Amsterdam
Primary Production Role	Player-facing web/API services, applications, production databases, wallet ledger, supplier integrations, analytics, security services and operational reporting sources.
Curaçao Tier-IV Critical Records Data Centre	Platform Provider Backup and DR / Curaçao critical-records environment
Curaçao Data Centre Location	Curaçao Backup and DR / critical-records environment (address held in Platform evidence pack)
Hosting / Colocation Provider	Platform Provider / hosting provider
Server Owner / Custodian	Platform Provider / IT Security and Infrastructure Owner
Server Role	Dedicated Critical Records Server / repository for CGA accessibility, regulatory evidence preservation and read-only critical-record datasets. It is not the player-facing production environment.
Server Hardware	Server hardware and capacity maintained by Platform Provider in the Platform evidence pack
Data Classes Replicated	Player account records, KYC status indicators, responsible-gaming restrictions, game transactions, betting transactions, wallet ledger, financial transactions, complaints/ADR references, incident report references and audit integrity reports.
Replication Method	Encrypted change-data capture from the primary production data centre and reporting repositories into the Curaçao critical-records repository.
Replication Frequency	Near real-time replication for wallet, game and financial transactions with a maximum target RPO of 15 minutes; daily full integrity report.
Encryption	Encrypted transport, encrypted volumes and restricted key administration.
Integrity Controls	Record counts, hash totals, transaction sequence numbers, timestamps, source-system IDs, supplier references and exception alerts.

Control Area	Operational Implementation
CGA Access Model	Controlled read-only access through approved secure channel, MFA, IP allowlist/VPN, named access profile and complete access logging.
Monitoring	Automated replication failure alerts, storage health monitoring, data-centre availability monitoring, daily exception report and monthly Compliance review.
Backups	Encrypted daily full backups, 4-hour incremental backups for critical datasets and quarterly restore tests.

13.2 CGA Access and Evidence Procedure

1. IT Security maintains a restricted read-only CGA access profile separated from operational administration accounts.
2. Compliance approves the dataset scope available through the CGA access channel and confirms that the scope covers players, game transactions and financial transactions required for supervision.
3. The access channel records every access event with user, timestamp, source, dataset, query/export reference and success/failure status.
4. Daily integrity reports compare primary production data-centre source counts against replicated Curaçao critical-record counts. Differences generate a ticket and remain open until corrected.
5. Monthly Compliance review confirms that replication is active, access logs are retained, data classes remain complete and the Critical Records Server / repository remains hosted within the approved Curaçao Tier-IV data-centre environment.

14. Responsible Gaming and Responsible Advertising

The Operator operates a responsible gaming framework covering information, player tools, behaviour monitoring, interventions, staff training, marketing suppression and annual management review. The tools are available across FanSport and TopBet and include 18+ information, Responsible Gaming page, deposit limits, loss limits, time/session limits, cooling-off, self-exclusion, self-assessment, reality checks, marketing suppression and cross-brand enforcement.

14.1 Player-Controlled Tools

Tool	Operational Implementation
Deposit Limits	Player can set limits for 24 hours, 7 days and 30 days. Limit decreases take effect immediately; increases pass through a cooling review period before activation.
Loss Limits	Player can configure loss restrictions by period. The wallet and betting engine enforce the restriction before bet acceptance.
Time / Session Limits	The platform records session duration and enforces configured time limits through warnings or forced breaks.
Reality Checks	The interface displays time-spent and balance/activity reminders during play.
Self-Assessment	The Responsible Gaming page includes a self-assessment tool and directs players to support resources.
Cooling-Off	Short-term breaks suspend gambling activity and promotional contact during the selected period.
Self-Exclusion	Available periods are 1 year, 3 years, 5 years, 10 years and lifetime; applied immediately across FanSport and TopBet.
Marketing Suppression	Self-excluded, cooling-off, vulnerable, banned and opted-out players are excluded from email, SMS, phone, push, VIP, bonus and affiliate campaigns.

14.2 Responsible Gaming Monitoring and Intervention Procedure

1. The system monitors risk indicators including deposit frequency, failed deposits, rapid stake escalation, long sessions, frequent limit changes, repeated withdrawal cancellations, distress language, complaints and support interactions.
2. Responsible Gaming staff review alerts and apply proportionate interventions: automated message, personal message, safer-gambling information, limit recommendation, temporary restriction, KYC/AML review, cooling-off or exclusion.
3. Support and VIP staff escalate player vulnerability indicators to Responsible Gaming and do not offer bonuses, retention incentives or VIP upgrades to players under review.
4. All interventions are logged with player ID, brand, reason, evidence, action, staff member, date and follow-up requirement.
5. The Responsible Gaming Owner prepares an annual responsible-gaming review covering tool usage, exclusions, interventions, complaints, training, marketing suppression and improvement actions.

14.3 Responsible Advertising and Marketing Suppression

The CRM and marketing tools use suppression lists sourced from account status, consent preferences, self-exclusion, cooling-off, responsible-gaming flags, operator bans, underage or KYC restrictions, sanctions/AML restrictions and manual opt-outs. Marketing campaigns, bonus offers, VIP communication, affiliate campaigns, push notifications, email, SMS and telephone contact are screened against the suppression list before dispatch. Campaign evidence records suppression checks, approval, audience count, creative approval and post-send exceptions.

- Advertising does not target minors, self-excluded players, vulnerable players or players who have opted out of marketing.
- Advertising does not present gambling as a source of income, investment solution, social success, financial relief or necessary part of personal identity.
- Bonus and promotion terms are displayed in clear language with wagering requirements, expiry, restrictions and withdrawal conditions.
- Affiliate traffic is monitored for prohibited claims, misleading content, underage targeting, unauthorised domains and missing responsible-gaming messaging.

15. Terms and Conditions and Public Information

The Operator maintains clear, understandable and accessible player-facing Terms and Conditions, policies, game rules and public information in English and in any additional target-market language where applicable. The legal footer and account menu link to the current versions from every player-facing page where technically practicable.

Document	URL	Version Date	Required Content
Terms and Conditions	https://fan-sport.cc/information/rules/terms/1 https://top-bet.com/information/rules/1	2.1 01/04/2026	Operator identity, account rules, closure/suspension, funds, winnings, currency, withdrawal, dormant accounts, complaints/ADR, Curaçao law and court.
Privacy Policy	https://fan-sport.cc/en/information/rules/terms/8 https://top-bet.com/en/information/rules/privacy_policy#1	2.1 01/04/2026	Personal data processing, purposes, retention, data-subject requests, transfers, security and contact.
Responsible Gaming Policy	https://fan-sport.cc/en/information/rules/terms/2 https://top-bet.com/en/information/rules/23	2.1 01/04/2026	RG tools, limits, self-exclusion, cooling-off, support resources and marketing suppression.
Self-Exclusion Policy	https://fan-sport.cc/en/information/rules/terms/3 https://top-bet.com/en/information/rules/5	2.1 01/04/2026	Periods, immediate effect, cross-brand enforcement, withdrawal access and reactivation rules.
AML / KYC Policy	https://fan-sport.cc/en/information/rules/terms/5 https://fan-sport.cc/en/information/rules/terms/7 https://top-bet.com/en/information/rules/21 https://top-bet.com/en/information/rules/22	2.1 01/04/2026	Identity verification, source of funds, sanctions, PEP, unusual transaction review and restrictions.
Complaints and ADR Policy	https://fan-sport.cc/en/information/rules/terms/4 https://top-bet.com/en/information/rules/6	2.1 01/04/2026	Free complaints process, deadlines, escalation and ADR provider information.
Deposits and Withdrawals Policy	https://fan-sport.cc/en/information/rules/terms/14 https://top-bet.com/en/information/rules/7#2	2.1 01/04/2026	Payment methods, limits, fees, processing time, same-currency payout and account ownership.
Sports Rules	https://fan-sport.cc/en/information/rules/terms/16 https://top-bet.com/en/information/rules/10	2.1 01/04/2026	Market rules, settlement, voids, postponed/abandoned events, obvious error and dead heat.
Casino Rules	https://fan-sport.cc/en/information/rules/terms/23 https://top-bet.com/en/information/rules/16	2.1 01/04/2026	Game rules, RTP/paytables where applicable, interrupted rounds and provider-specific rules.
Bonus Terms	https://fan-sport.cc/en/information/rules/terms/9 https://top-bet.com/en/information/rules/7	2.1 01/04/2026	Bonus eligibility, wagering, expiry, restrictions, cancellation and conversion.
Refund Policy	https://fan-sport.cc/en/information/rules/terms/24 https://top-bet.com/en/information/rules/7#2	2.1 01/04/2026	Refund, void, reversal, failed deposit, failed withdrawal and chargeback rules.

15.1 Public Information Checklist

The footer, legal pages and help centre display the licence holder name, company registration number, licence reference, licence date and duration, registered address, customer service contact details, CGA as licensing authority and supervisor, dynamic CGA seal, age and vulnerable-person prohibition, game rules, odds/RTP or payout method, costs, responsible gaming tools, complaints and disputes process, payout timing and currency information.

15.2 Terms Change Procedure

1. Legal drafts the change and explains the affected clause, reason, effective date, player impact and regulatory basis.
2. Compliance reviews responsible gaming, AML/CFT, complaint/ADR, withdrawal, account closure, funds and reporting implications.
3. Product verifies that the updated policy URL and version date display correctly on desktop and mobile/PWA interfaces.
4. Players receive clear notice of material changes upon login or through account messaging before continued play where the change affects their rights or obligations.
5. The previous policy version, approval and evidence screenshots are archived in the evidence repository.

16. Complaints, Disputes and ADR

The Operator provides a free, accessible complaints procedure and an independent ADR escalation route. Complaints are accepted through the complaint form, support email, live chat and account message channel. The complaint file contains the player ID, brand, complaint category, date received, evidence, investigation steps, decision, response date, escalation and closure status.

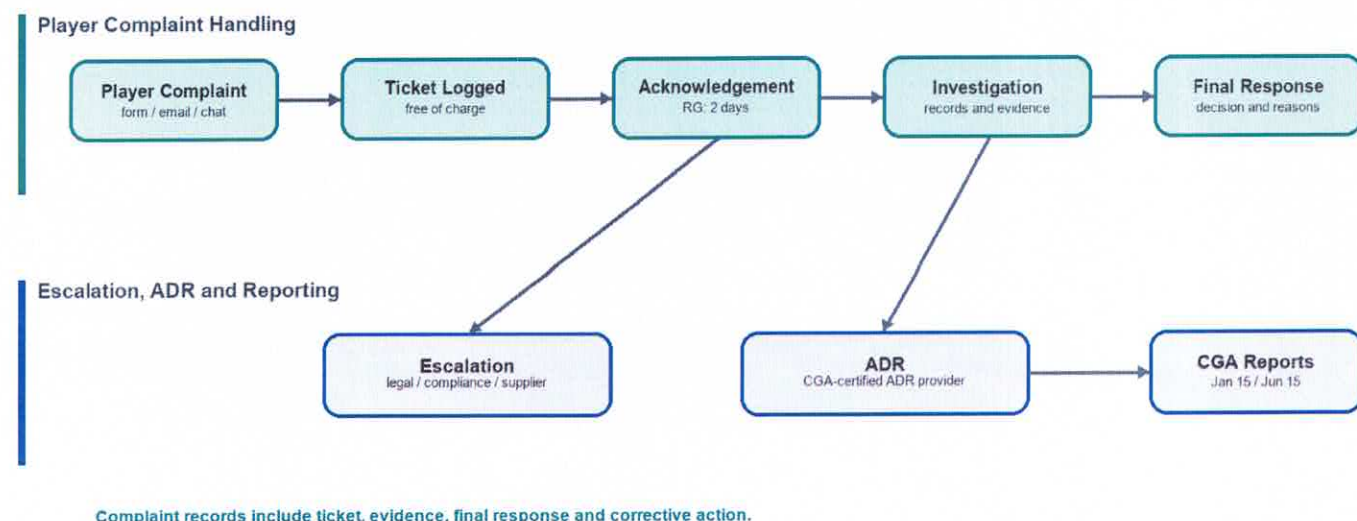


Figure 4. Complaints and ADR workflow.

16.1 Complaint Handling Procedure

1. Support registers every complaint as a ticket and categorises it as responsible gaming, payment/withdrawal, account/KYC, sportsbook settlement, casino/game round, bonus, technical, privacy/data, AML/CFT restriction, marketing or other complaint.
2. The complaint is free for the player and can be submitted within six months of the event complained about. Event-result claims are logged with event, market, bet ID and official source references.
3. Responsible-gaming complaints are acknowledged in writing within 2 days and receive best-effort resolution within 5 business days. Any delay is explained and tracked by the Complaints Owner.
4. Other complaints receive acknowledgement promptly and a final response within 4 weeks. Where more time is required, the player receives the reason, expected response date and escalation option.
5. The investigator uses official records only: wallet ledger, bet slip, game-round logs, supplier records, payment status, KYC/AML records, support transcripts and policy version active at the time.
6. Second-line Support, Compliance, Payments, Product, Legal or supplier teams are involved according to complaint category. The final response explains the outcome, evidence basis and any corrective action or credit/refund.
7. The player is informed of the ADR route when the complaint is not resolved to the player's satisfaction or when the player requests escalation.

16.2 ADR Procedure

The Operator engages the following independent ADR provider for unresolved player disputes:

ADR Provider: ADR provider identified in the published Complaints and ADR Policy | Website:

<https://fan-sport.cc/en/information/rules/terms/4> and <https://top-bet.com/en/information/rules/6> | Contract Owner: Customer Support and Complaints Owner / Legal

1. The ADR route is available free of charge to the player. The Operator bears the ADR process costs charged by the provider.
2. When the player requests ADR, the Complaints Owner creates the ADR file containing the complaint ticket, final response, policy versions, transaction evidence, correspondence and internal decision record.
3. Legal and Compliance review the ADR file for completeness before submission to the ADR provider. Sensitive information is limited to what is required for the dispute and lawful regulatory process.
4. The Operator cooperates with ADR information requests, preserves the file and implements final corrective action when required by the ADR outcome, settlement or management decision.
5. ADR cases are included in the complaint/ADR report to CGA and retained in the evidence repository.

16.3 Complaint Root-Cause and Management Review

The Complaints Owner prepares monthly complaint trend reports covering volume, category, brand, age, resolution time, upheld cases, ex gratia payments, refunds, supplier issues, RG complaints, ADR referrals and corrective actions. Compliance reviews trends for systemic issues, reporting obligations and policy or UI improvements.

17. CGA Reporting and Record Keeping

Compliance coordinates all CGA reporting and maintains an auditable report archive. Each report includes data source, responsible owner, preparer, reviewer, approver, submission channel, submission timestamp, supporting evidence and acknowledgement or confirmation where available.

Report	Deadline / Frequency	Data Source	Owner	Review and Approval
Change / Amendment Report	Semi-annual cycle: by 15 January and 15 June; also before or when required for critical changes.	Manual change log, supplier register, domain register, ownership/key person register, policy updates, system changes.	Compliance Reporting Owner	Compliance prepares; Legal/IT/Product/Finance review; Resident Managing Director approves.
Incident Report	Within 24 hours for reportable incidents or from confirmed occurrence according to the incident assessment.	Incident ticket, timeline, systems affected, player/funds impact, containment, restoration, preliminary RCA, evidence.	Incident Reporting Owner	Incident Manager drafts; Compliance determines reportability; IT/Legal/Management approve.
Player Transaction Report	According to CGA template, schedule or request.	Player account, wallet ledger, game and betting transactions, financial transactions, brand and timestamps.	CGA Reporting / Data Owner	Data extract generated from reporting repository and verified against control totals.
Complaints Report	According to CGA instructions and periodic complaint reporting schedule.	Complaint register, categories, ageing, outcomes, RG complaints, corrective actions.	Customer Support and Complaints Owner	Support prepares; Compliance reviews and submits.
ADR Report	According to CGA instructions and periodic ADR reporting schedule.	ADR referrals, provider, status, outcome, cost, implementation action.	Customer Support and Complaints Owner / Legal	Legal/Compliance review before submission.
Independent Expert AML/CFT Report	Upon CGA request or scheduled independent review.	AML/CFT/CPF framework, risk assessment, controls, cases, training and reporting evidence.	AML/CFT/CPF Compliance Officer	Independent Expert / Auditor
Independent System / Responsible Gaming Report	Upon CGA request or scheduled independent review.	System design, certification, security, responsible gaming controls and evidence.	Compliance / IT Owner	Independent Expert / Auditor
Annual Financial Statements	By 30 June for the prior financial year.	Financial statements, player funds records, accounting data, audit/review evidence.	Finance Owner	Auditor / Accounting Firm
FIU/goAML Unusual Transaction Report	Without delay where the reporting obligation or suspicion threshold is met.	AML case file, transaction data, player profile, screening results and supporting evidence.	AML/CFT/CPF Compliance Officer	AML/CFT Officer files through FIU/goAML and preserves evidence.
Support Operational Reports	Daily, weekly and monthly management cycles.	Inquiry volume, service quality, workload, inquiry categories and trends.	Customer Support Owner	Support team leaders prepare and Compliance reviews complaint trends.

17.1 Incident Escalation Matrix

Severity	Examples	Escalation Time	Owner	Regulatory Action
Severity 1 - Critical	Game integrity failure, player funds imbalance, major outage, data breach, sanctions breach, RG exclusion failure, loss of Tier-IV replication.	Immediate	Incident Manager	Compliance decision for CGA 24-hour report; management notification.

Severity	Examples	Escalation Time	Owner	Regulatory Action
Severity 2 - High	Partial outage, PSP failure, supplier settlement error, failed reporting extract, security alert with contained impact.	Within 1 hour	IT / Operations Owner	Compliance review; report if regulatory impact exists.
Severity 3 - Medium	Non-critical defect, minor UI issue affecting public information, single-player balance dispute, delayed support queue.	Same business day	Business Owner	Tracked in ticketing; included in trend review where repeated.
Severity 4 - Low	Cosmetic issue or low-risk process exception.	Next business day	Team Owner	Resolved through standard change process.

17.2 Regulatory Record-Keeping Procedure

1. All regulatory reports, supporting data extracts, approval evidence, submission confirmations and correspondence are stored in the Compliance evidence repository.
2. Records are indexed by report type, reporting period, brand, responsible owner, submission date and source systems used.
3. Data extracts are accompanied by control totals such as record count, total stakes, total wins, total deposits, total withdrawals, active players, complaints count or ADR count where applicable.
4. The archive is accessible to Compliance, Legal, approved management and IT Security administrators responsible for preservation, with access logged and reviewed.

17.3 CGA Digital Record Export Field Set

The platform response requires regular digital record availability for players, gaming transactions and financial transactions. Exports are produced from the Operator repository, reporting repository or Platform evidence pack in CSV, XLSX or another CGA-approved format when requested or required.

Required Field	Operational Treatment
Player Account ID	Unique player-account identifier used in wallet, game, payment, complaint and KYC records.
Player Account Country	Country or jurisdiction recorded for the player account and used for restriction, reporting and risk controls.
Transaction ID	Unique transaction identifier or supplier/reference ID for the relevant deposit, withdrawal, game round, bet, adjustment, refund or reversal.
Date of Transaction	Timestamp retained in platform time and reported with the applicable timezone convention used by the evidence extract.
Currency of Transaction	Currency code used for the transaction, wallet ledger and reconciliation record.
Transaction Amount	Amount recorded in the player ledger and reconciled against PSP, sportsbook, casino or supplier settlement evidence.
Payment Method	Payment channel, PSP, bank-transfer, card, e-wallet, crypto or other method used for the transaction, where applicable.

18. Annual Permanent Education and Training Evidence

The Operator operates an annual permanent education programme covering responsible gaming, AML/CFT/CPF, crime prevention, anti-bribery, mental well-being, player communication, responsible advertising, data protection, information security, incident reporting, complaints and operational controls. Training is mandatory for employees and contractors whose roles affect the remote gaming operation.

Audience	Curriculum	Frequency	Owner	Evidence
All Staff	Code of conduct, anti-bribery, crime prevention, data protection, information security, incident escalation, player communication.	Onboarding and annual refresher	HR / Training Owner	Attendance record, policy acknowledgement and quiz score.
Support	Complaints, RG indicators, vulnerable players, self-exclusion, KYC escalation, payment queries, communication standards.	Onboarding, annual refresher and quarterly micro-training	Support Training Owner	Training pack, attendance and quality monitoring results.
AML / Payments / Risk	AML/CFT/CPF, sanctions, PEPs, source of funds, unusual transactions, crypto indicators, FIU/goAML, tipping-off controls.	Onboarding and annual specialist refresher	AML/CFT/CPF Compliance Officer	Assessment score, case workshop evidence and remediation log.
Marketing / CRM / Affiliates	Responsible advertising, prohibited claims, suppression lists, bonus transparency, affiliate review and vulnerable-player exclusion.	Onboarding and annual refresher	Marketing Compliance Owner	Campaign approval samples and training evidence.
IT / Product / QA	Secure change, logging, access control, backup/restore, game certification, RG control testing, incident response and evidence capture.	Onboarding and annual refresher	IT Security and Infrastructure Owner	Access review, test reports and training evidence.
Management and Key Persons	LOK/CGA obligations, governance, reporting, incidents, supplier oversight, funds segregation and manual approval.	Annual management workshop	Resident Managing Director	Sign-in sheet, board/minutes and action tracker.

18.1 Training Evidence Procedure

1. HR creates the annual training calendar and maps each role to required modules.
2. New staff complete mandatory modules before receiving production access or handling player contacts.
3. Training completion is recorded with participant name, role, department, date, module, trainer, assessment score and acknowledgement.
4. Missed or failed training creates a remediation task. The user's access to relevant operational functions is restricted where the missed training creates compliance risk.
5. Compliance reviews training completion quarterly and includes annual evidence in the manual evidence pack.

19. Change Control and Manual Governance

Operational changes are controlled from request to approval, testing, release, evidence capture and regulatory reporting. The process applies to domains, suppliers, games, software, payment methods, player-facing policies, responsible gaming tools, AML/CFT rules, infrastructure, data storage, security controls, reporting extracts and this manual.

Stage	Procedure	Owner
Change Request	Business owner submits purpose, scope, affected brand, systems, player impact, data impact, regulatory impact and proposed implementation date.	Business Change Owner
Compliance Classification	Compliance classifies the change as standard, material, critical, CGA-approval required, CGA-notification required or reportable in the next amendment report.	Compliance Officer
Risk and Legal Review	Legal, IT Security, Finance, Product, AML/CFT and Responsible Gaming review where relevant.	Legal / Risk Owner
Testing	QA tests functional controls, wallet impact, RG controls, KYC/AML enforcement, reporting extracts, security, audit logging and rollback.	QA Owner
Approval	Release approval is recorded by Product, IT, Compliance and management according to criticality.	Product / IT / Compliance / Management Approver
Release and Evidence	Release notes, screenshots, configuration, test evidence and rollback evidence are stored in the evidence repository.	Release Owner
Manual Update	The manual, supplier register, domain register, policy URLs, screenshot pack and evidence pack are updated when the change affects manual content.	Operations Manual Owner
CGA Reporting	Critical or reportable changes are submitted through the appropriate CGA channel and included in the reporting archive.	CGA Reporting Owner

19.1 Version Control Rules

- Major version number changes when a regulatory, operating-model, supplier, domain, technology, wallet, RG, AML/CFT or reporting process changes materially.
- Minor version number changes when wording, screenshots, evidence references or non-material procedures are updated.
- Every version includes date, preparer, reviewer, approver, summary of changes and evidence references.
- Superseded versions remain archived and available for inspection.

20. Evidence Pack and Management Approval

The evidence pack is maintained with the manual so that the Operator can demonstrate the procedures described in this document. Each evidence item has an owner, repository location, version/date, approval status and retention period.

Evidence Area	Evidence Included	Repository	Owner
Licence and Corporate	CGA registry extract, licence correspondence, company registration, resident director evidence, local address evidence.	Operator compliance evidence repository	Compliance Owner
Domains and Player Interface	Approved domains, screenshots, CGA seal evidence, legal footer, policies, terms, game rules, RG pages.	Operator compliance evidence repository	Product / Compliance Owner
Supplier and Software	Supplier contracts, due diligence, certifications, test lab reports, system register, API inventory.	Operator compliance evidence repository / Platform evidence pack	Procurement / IT Owner
Game Integrity	Game certificates, RNG certificates, sportsbook certificates, release tests, game inventories, disabled-game records.	Operator compliance evidence repository / Platform evidence pack	Product / QA Owner
Payments and Player Funds	Segregated funds evidence, reconciliations, PSP statements, wallet liability reports, manual adjustment approvals.	Operator compliance evidence repository	Finance Owner
KYC / AML / CFT / CPF	KYC samples, sanctions screening, risk assessment, AML cases, FIU/goAML evidence, training and independent reports.	Operator compliance evidence repository	AML/CFT/CPF Compliance Officer
Responsible Gaming	Limit tests, self-exclusion records, interventions, marketing suppression tests, RG annual report, training evidence.	Operator compliance evidence repository	Responsible Gaming Owner
Information Security and DR	Access reviews, vulnerability scans, penetration test, backup/restore tests, DR exercise, incident tickets.	Operator compliance evidence repository / Platform evidence pack	IT Security and Infrastructure Owner
CGA Reporting	Change, incident, player transaction, complaint, ADR, expert and financial reports with approval and submission evidence.	Operator compliance evidence repository	CGA Reporting Owner
Complaints and ADR	Complaint register, case files, ADR provider agreement, ADR submissions, outcomes and CGA reports.	Operator compliance evidence repository	Customer Support and Complaints Owner
Training	Annual training plan, attendance, assessments, remediation, management workshop records.	Operator compliance evidence repository	HR / Compliance Owner

20.1 Management Approval

Approval Role	Name	Signature	Date
Resident Managing Director / Local Responsible Person	Resident Managing Director	Signature	Date
Compliance and CGA Reporting Owner	Compliance Officer	Signature	Date
AML/CFT/CPF Compliance Officer	AML/CFT/CPF Compliance Officer	Signature	Date

Approval Role	Name	Signature	Date
Responsible Gaming Owner	Responsible Gaming Owner	Signature	Date
IT Security and Infrastructure Owner	IT Security and Infrastructure Owner	Signature	Date
Payments and Finance Owner	Payments and Finance Owner	Signature	Date

Appendix A. Required Screenshot Evidence List

This list is used to confirm screenshot evidence coverage in the manual and to build the evidence pack. Each screenshot is captured for FanSport and TopBet, desktop and mobile/PWA where applicable, with date, version and environment label.

No.	Screenshot	Description	Brand	View
1	Homepage and footer	Show licence holder details, CGA seal, 18+ notice, Terms, Responsible Gaming, complaints/ADR and support links.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
2	Registration page	Show mandatory fields, age gate, terms acceptance, privacy notice and restricted-country controls.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
3	Login page and account dashboard	Show login, account status, wallet, profile menu and legal footer access.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
4	Account profile page	Show personal data fields, verification status, contact preferences and security options.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
5	KYC document upload page	Show document requirements, upload status, verification messaging and restriction notice.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
6	Cashier deposit page	Show methods, limits, fees, currency, account-owner warning and responsible gaming access.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
7	Cashier withdrawal page	Show withdrawal methods, limits, processing time, KYC restrictions and same-currency payout notice.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
8	Sportsbook lobby and event page	Show sports, markets, odds, event details, market status and rules access.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
9	Sportsbook betslip	Show selection, odds, stake, possible payout, acceptance control and error messages.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
10	Live betting page	Show in-play market, suspension behaviour and responsible gaming access.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
11	Casino lobby	Show providers, categories, RTP/rules link where applicable and game launch control.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
12	Casino game launch and interrupted round message	Show balance, game rules, round ID/evidence where applicable and error/restore behaviour.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
13	Live casino lobby and game table	Show provider, table limits, rules and game history access.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
14	Virtual sports page	Show event schedule, rules, odds and results.	FanSport / TopBet	Desktop and Mobile/PWA where applicable

No.	Screenshot	Description	Brand	View
15	Poker lobby / table / tournament if applicable	Show buy-in, rules, rake/prize information and account balance.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
16	Bingo / TV games / scratch cards pages	Show rules, stake, prize, result and game history.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
17	Responsible Gaming page	Show 18+ notice, information, support resources, self-assessment and tools.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
18	Deposit limit flow	Show 24-hour, 7-day, 30-day limit creation/change and confirmation.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
19	Loss and session/time limit flow	Show limit configuration and confirmation.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
20	Reality check / session reminder	Show active reminder during play.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
21	Cooling-off flow	Show available periods, confirmation and effect on account.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
22	Self-exclusion flow	Show 1, 3, 5, 10-year and lifetime periods, immediate effect and withdrawal access.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
23	Marketing preferences / opt-out	Show opt-out controls for email, SMS, phone, push and promotions.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
24	Complaint submission form	Show complaint category, fields, attachment, free complaint notice and ticket submission.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
25	Support chat / email / help centre	Show support channels and contact details.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
27	Terms and policy pages	Show version date, operator information and access from footer/account menu.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
28	Game rules / sports rules / casino rules pages	Show rules, odds/RTP/payout method and settlement information.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
29	Bonus terms / offer opt-in page	Show wagering, expiry, eligibility, restrictions and withdrawal terms.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
30	Error pages and restricted account messages	Show blocked self-excluded account, KYC restriction, country restriction and responsible gaming restriction messages.	FanSport / TopBet	Desktop and Mobile/PWA where applicable
31	CGA seal verification click-through	Show dynamic seal display and verification behaviour.	FanSport / TopBet	Desktop and Mobile/PWA where applicable

Detailed Screenshot Evidence Pages

The following pages attach the available FanSport and TopBet screenshots in the sequence required by the evidence list. All currently available evidence pages are attached in this appendix. Item 26 has been removed from the evidence scope because it is outside the current evidence package.

Appendix A.1 Screenshot Evidence

Homepage and footer

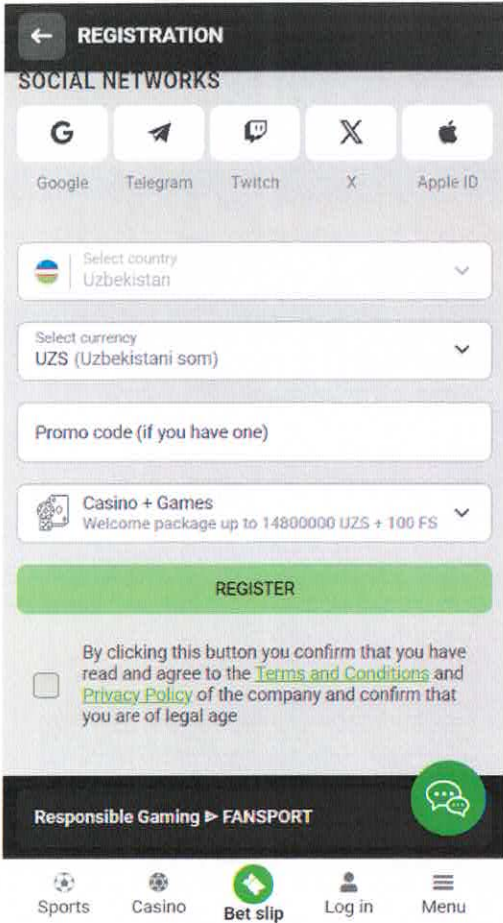
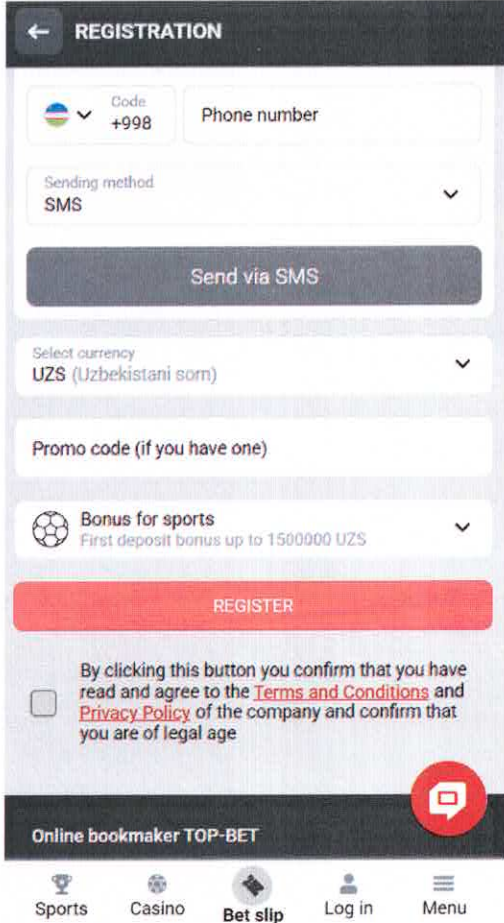
EVIDENCE ID	REQUIREMENT	VIEW	STATUS
1.1 / 1.2	Show licence holder details, CGA seal, 18+ notice, Terms, Responsible Gaming, complaints/ADR and support links.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
Figure A.1-1. FanSport evidence for Homepage and footer (source file 31.1.png).	Figure A.1-2. TopBet evidence for Homepage and footer (source file 31.2.png).

Appendix A.2 Screenshot Evidence

Registration page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
2.1 / 2.2	Show mandatory fields, age gate, terms acceptance, privacy notice and restricted-country controls.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
Figure A.2-1. FanSport evidence for Registration page (source file 2.1.png).	Figure A.2-2. TopBet evidence for Registration page (source file 2.2.png).

Appendix A.3 Screenshot Evidence

Login page and account dashboard

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
3.1 / 3.2	Show login, account status, wallet, profile menu and legal footer access.	Desktop and Mobile/PWA where applicable	Screenshot inserted

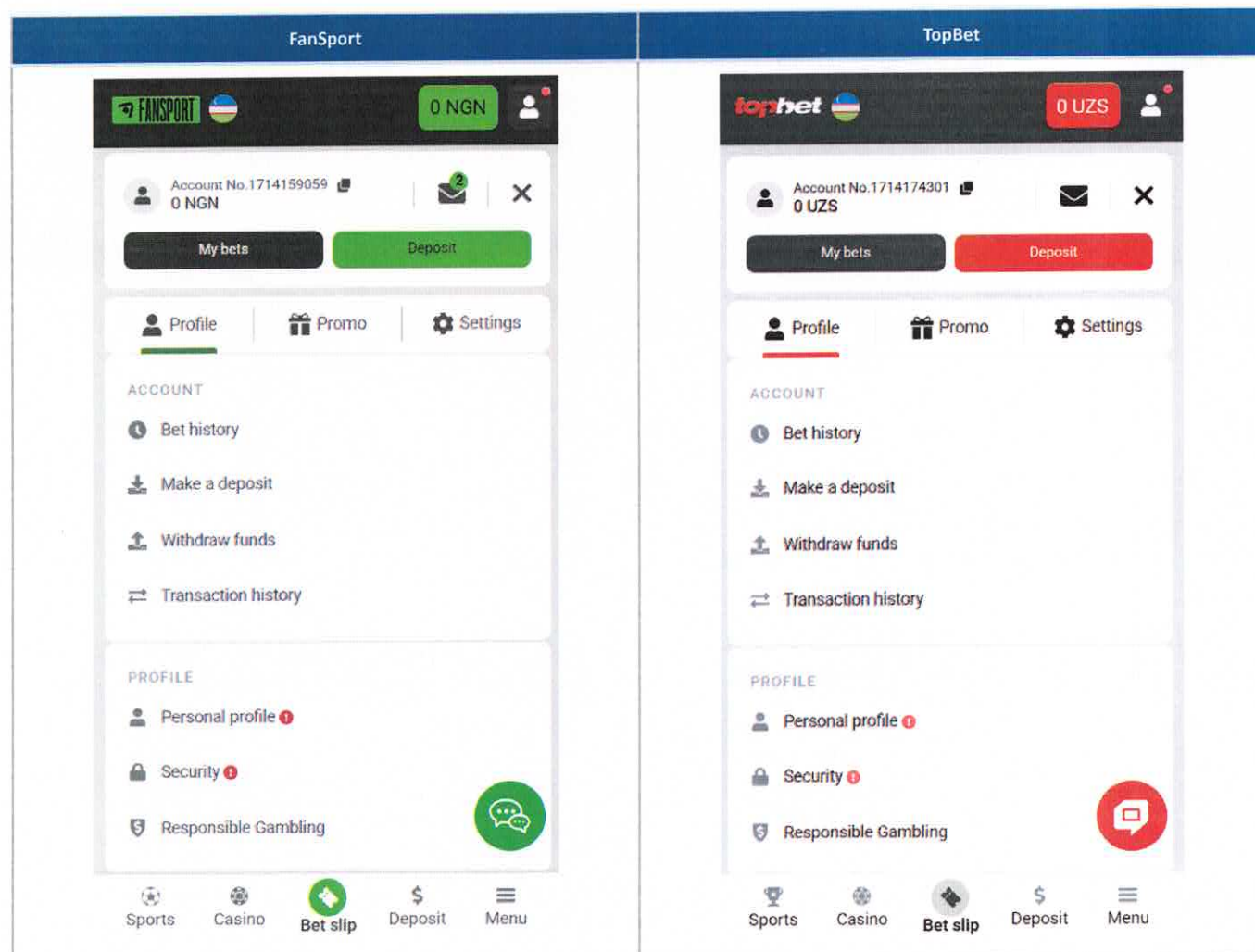


Figure A.3-1. FanSport evidence for Login page and account dashboard (source file 3.1.png).

Figure A.3-2. TopBet evidence for Login page and account dashboard (source file 3.2.png).

Appendix A.4 Screenshot Evidence

Account profile page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
4.1 / 4.2	Show personal data fields, verification status, contact preferences and security options.	Desktop and Mobile/PWA where applicable	Screenshot inserted

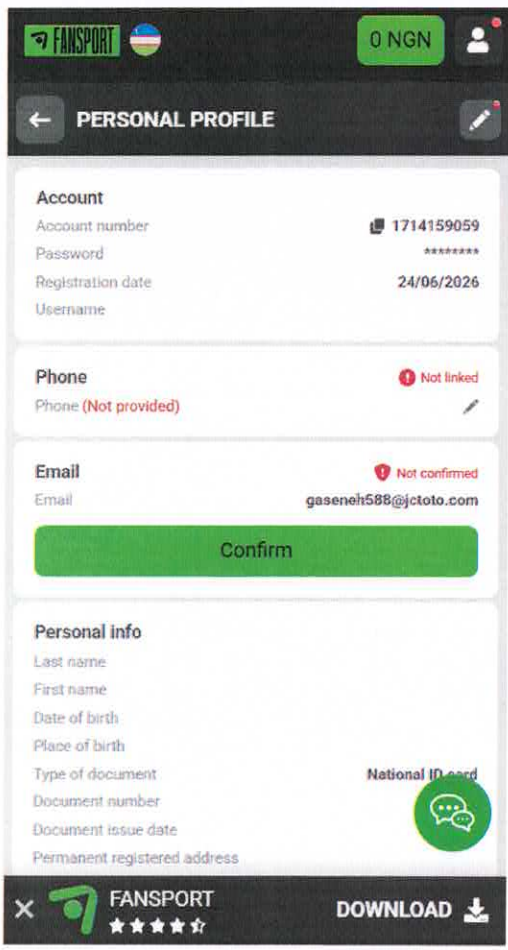
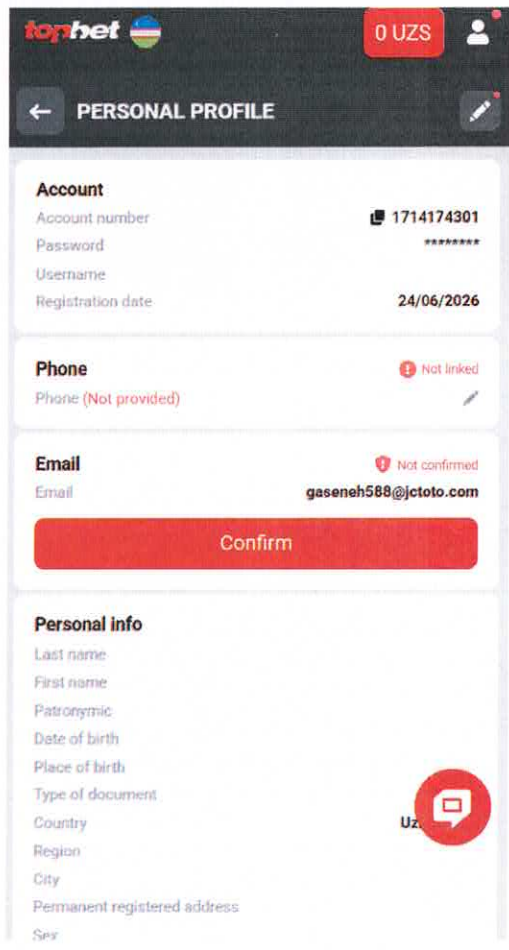
FanSport	TopBet
 The screenshot shows the FanSport mobile app interface. At the top, there's a header with the FanSport logo, a Nigerian flag, and a balance of 0 NGN. Below this is a 'PERSONAL PROFILE' section. The 'Account' section displays the account number 1714159059, a masked password, registration date 24/06/2026, and a masked username. The 'Phone' section shows 'Not linked' with a red exclamation mark icon. The 'Email' section shows 'Not confirmed' with a red exclamation mark icon and the email address gaseneh588@jctoto.com. A green 'Confirm' button is present. The 'Personal info' section lists fields for Last name, First name, Date of birth, Place of birth, Type of document, Document number, Document issue date, and Permanent registered address. A 'National ID card' icon is visible. At the bottom, there's a FanSport logo with five stars and a 'DOWNLOAD' button.	 The screenshot shows the TopBet mobile app interface. At the top, there's a header with the TopBet logo, a Uzbekistan flag, and a balance of 0 UZS. Below this is a 'PERSONAL PROFILE' section. The 'Account' section displays the account number 1714174301, a masked password, registration date 24/06/2026, and a masked username. The 'Phone' section shows 'Not linked' with a red exclamation mark icon. The 'Email' section shows 'Not confirmed' with a red exclamation mark icon and the email address gaseneh588@jctoto.com. A red 'Confirm' button is present. The 'Personal info' section lists fields for Last name, First name, Patronymic, Date of birth, Place of birth, Type of document, Country, Region, City, and Permanent registered address. A red 'Uz' icon is visible. At the bottom, there's a red 'Uz' icon.

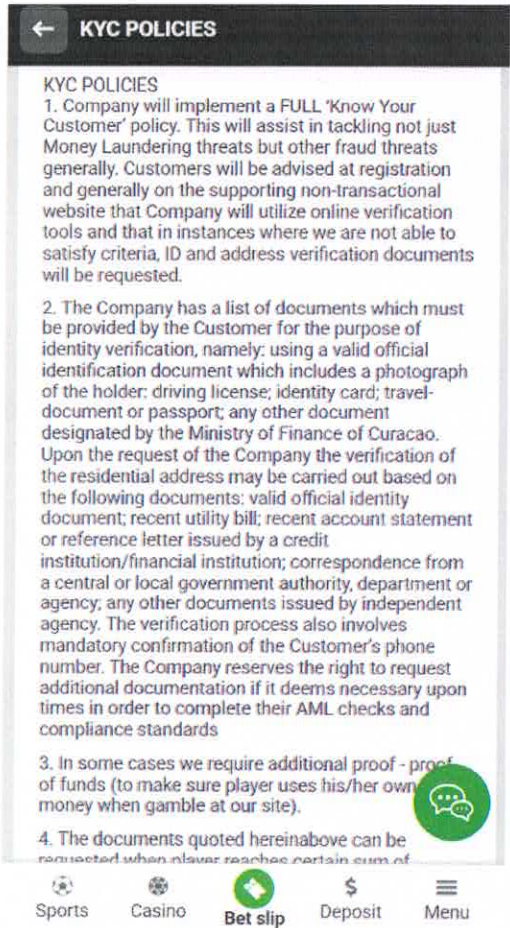
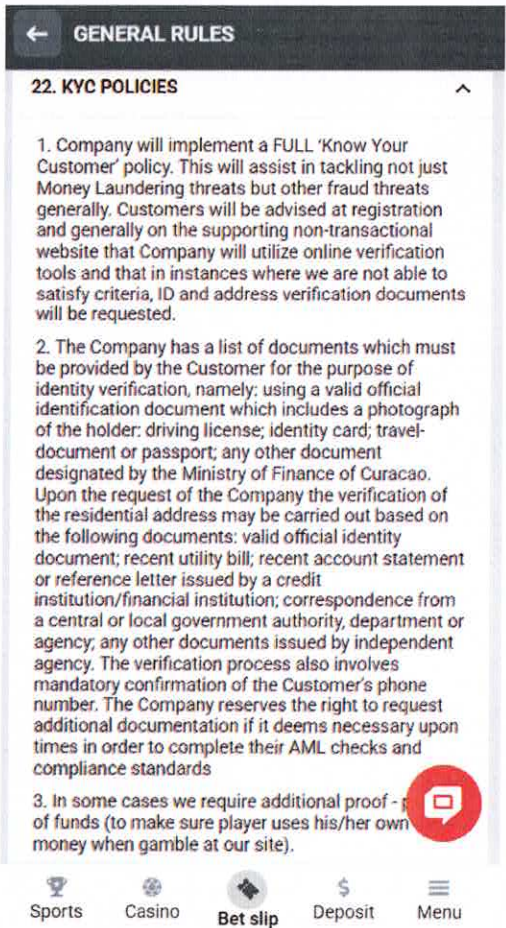
Figure A.4-1. FanSport evidence for Account profile page (source file 4.1.png).

Figure A.4-2. TopBet evidence for Account profile page (source file 4.2.png).

Appendix A.5 Screenshot Evidence

KYC document upload page

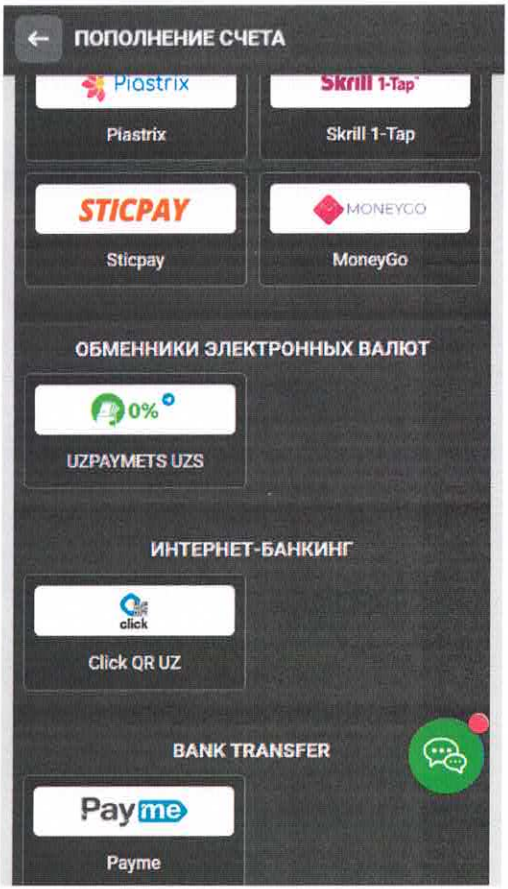
EVIDENCE ID	REQUIREMENT	VIEW	STATUS
5.1 / 5.2	Show document requirements, upload status, verification messaging and restriction notice.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
 KYC POLICIES KYC POLICIES 1. Company will implement a FULL 'Know Your Customer' policy. This will assist in tackling not just Money Laundering threats but other fraud threats generally. Customers will be advised at registration and generally on the supporting non-transactional website that Company will utilize online verification tools and that in instances where we are not able to satisfy criteria, ID and address verification documents will be requested. 2. The Company has a list of documents which must be provided by the Customer for the purpose of identity verification, namely: using a valid official identification document which includes a photograph of the holder; driving license; identity card; travel-document or passport; any other document designated by the Ministry of Finance of Curacao. Upon the request of the Company the verification of the residential address may be carried out based on the following documents: valid official identity document; recent utility bill; recent account statement or reference letter issued by a credit institution/financial institution; correspondence from a central or local government authority, department or agency; any other documents issued by independent agency. The verification process also involves mandatory confirmation of the Customer's phone number. The Company reserves the right to request additional documentation if it deems necessary upon times in order to complete their AML checks and compliance standards 3. In some cases we require additional proof - proof of funds (to make sure player uses his/her own money when gamble at our site). 4. The documents quoted hereinabove can be requested when player reaches certain sum of Sports Casino Bet slip Deposit Menu	 GENERAL RULES 22. KYC POLICIES 1. Company will implement a FULL 'Know Your Customer' policy. This will assist in tackling not just Money Laundering threats but other fraud threats generally. Customers will be advised at registration and generally on the supporting non-transactional website that Company will utilize online verification tools and that in instances where we are not able to satisfy criteria, ID and address verification documents will be requested. 2. The Company has a list of documents which must be provided by the Customer for the purpose of identity verification, namely: using a valid official identification document which includes a photograph of the holder; driving license; identity card; travel-document or passport; any other document designated by the Ministry of Finance of Curacao. Upon the request of the Company the verification of the residential address may be carried out based on the following documents: valid official identity document; recent utility bill; recent account statement or reference letter issued by a credit institution/financial institution; correspondence from a central or local government authority, department or agency; any other documents issued by independent agency. The verification process also involves mandatory confirmation of the Customer's phone number. The Company reserves the right to request additional documentation if it deems necessary upon times in order to complete their AML checks and compliance standards 3. In some cases we require additional proof - proof of funds (to make sure player uses his/her own money when gamble at our site). Sports Casino Bet slip Deposit Menu
Figure A.5-1. FanSport evidence for KYC document upload page (source file 5.1.png).	Figure A.5-2. TopBet evidence for KYC document upload page (source file 5.2.png).

Appendix A.6 Screenshot Evidence

Cashier deposit page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
6.1 / 6.2	Show methods, limits, fees, currency, account-owner warning and responsible gaming access.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
Figure A.6-1. FanSport evidence for Cashier deposit page (source file 6.1.png).	Figure A.6-2. TopBet evidence for Cashier deposit page (source file 6.2.png).

Appendix A.7 Screenshot Evidence

Cashier withdrawal page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
7.1 / 7.2	Show withdrawal methods, limits, processing time, KYC restrictions and same-currency payout notice.	Desktop and Mobile/PWA where applicable	Screenshot inserted

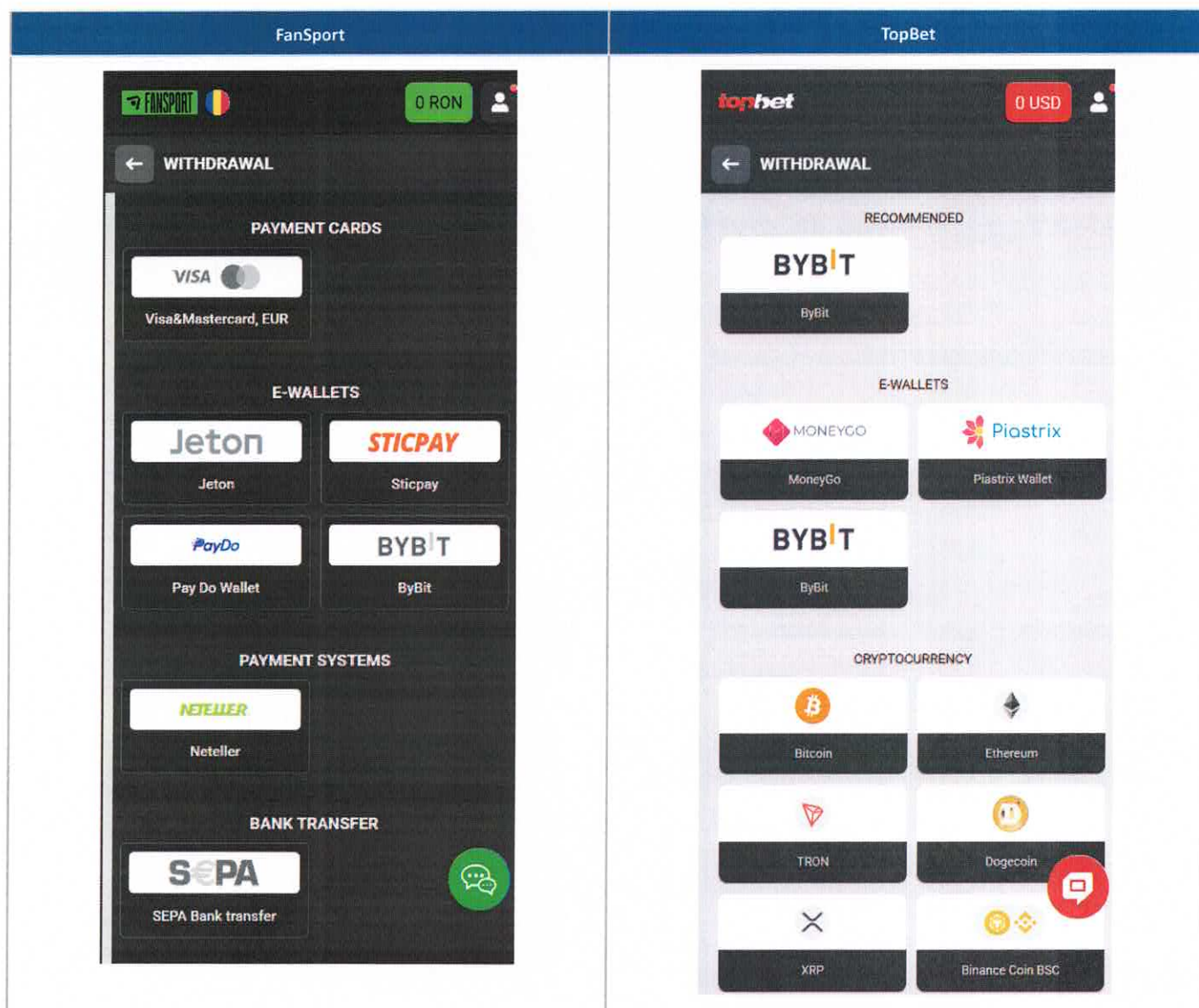


Figure A.7-1. FanSport evidence for Cashier withdrawal page (source file withdrwa - fansport.png).

Figure A.7-2. TopBet evidence for Cashier withdrawal page (source file withdrwa - topbet.png).

Appendix A.8 Screenshot Evidence

Sportsbook lobby and event page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
8.1 / 8.2	Show sports, markets, odds, event details, market status and rules access.	Desktop and Mobile/PWA where applicable	Screenshot inserted

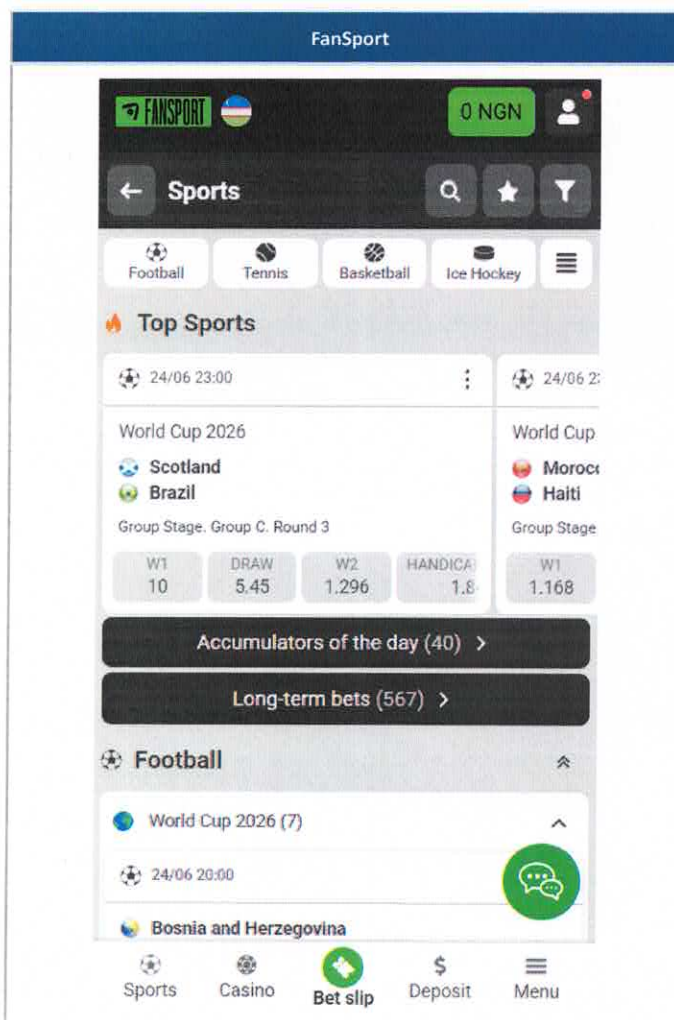


Figure A.8-1. FanSport evidence for Sportsbook lobby and event page (source file 8.1.png).

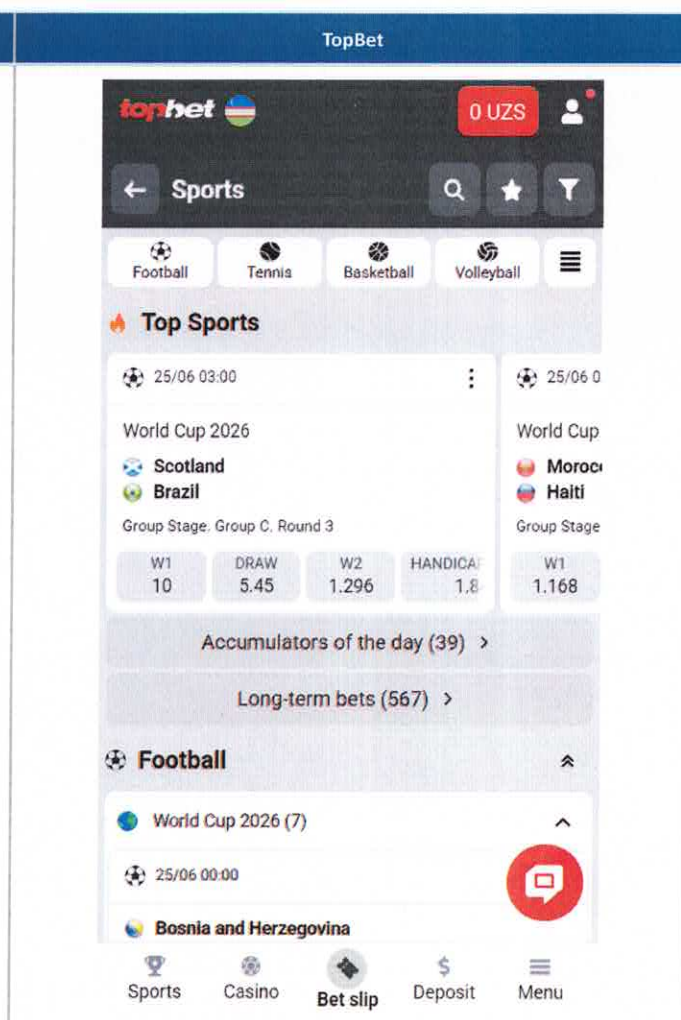


Figure A.8-2. TopBet evidence for Sportsbook lobby and event page (source file 8.2.png).

Appendix A.9 Screenshot Evidence

Sportsbook betslip

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
9.1 / 9.2	Show selection, odds, stake, possible payout, acceptance control and error messages.	Desktop and Mobile/PWA where applicable	Screenshot inserted

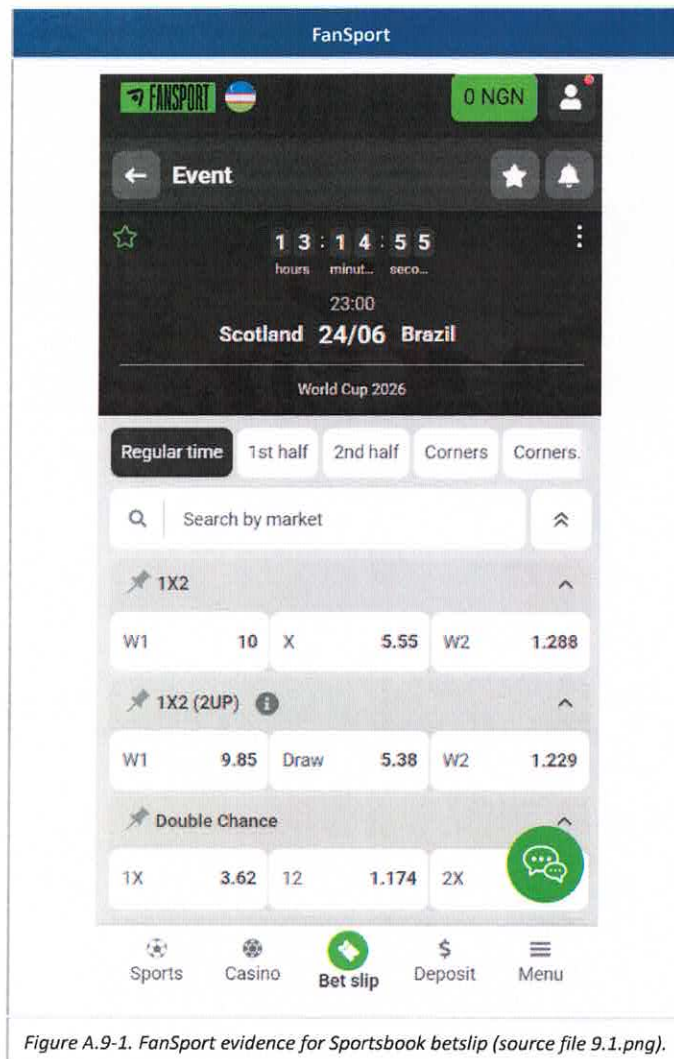


Figure A.9-1. FanSport evidence for Sportsbook betslip (source file 9.1.png).

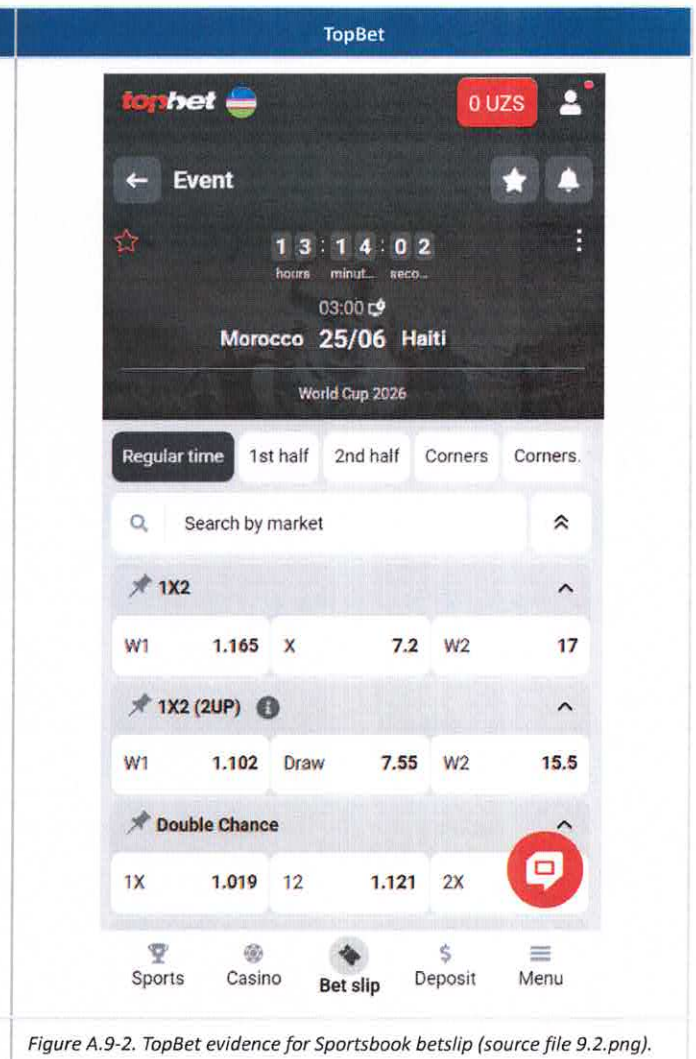


Figure A.9-2. TopBet evidence for Sportsbook betslip (source file 9.2.png).

Appendix A.10 Screenshot Evidence

Live betting page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
10.1 / 10.2	Show in-play market, suspension behaviour and responsible gaming access.	Desktop and Mobile/PWA where applicable	Screenshot inserted

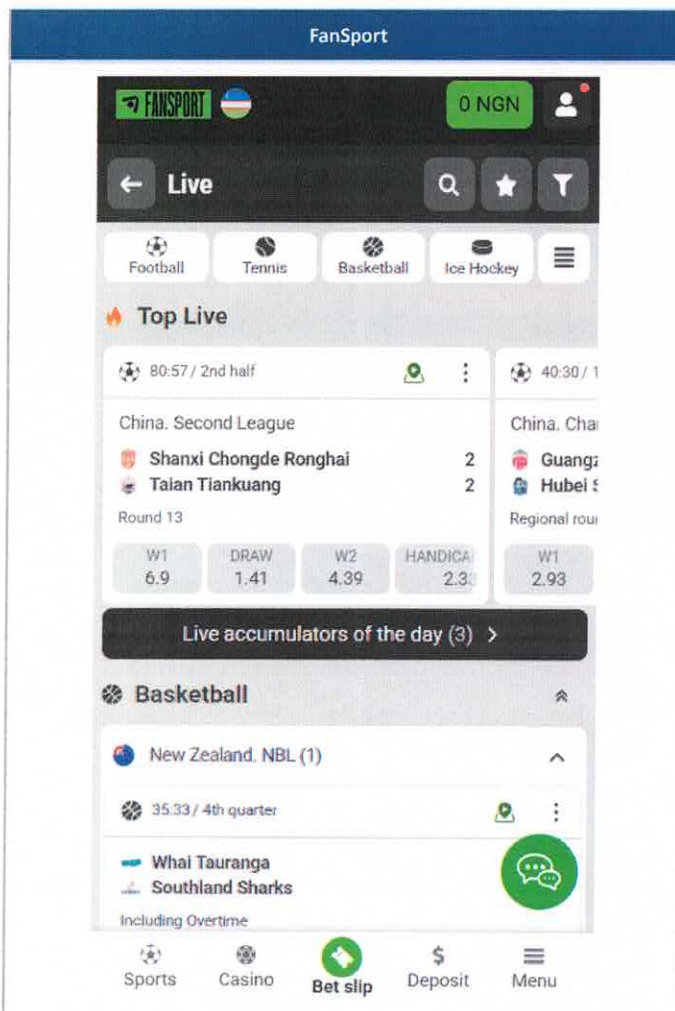


Figure A.10-1. FanSport evidence for Live betting page (source file 10.1.png).

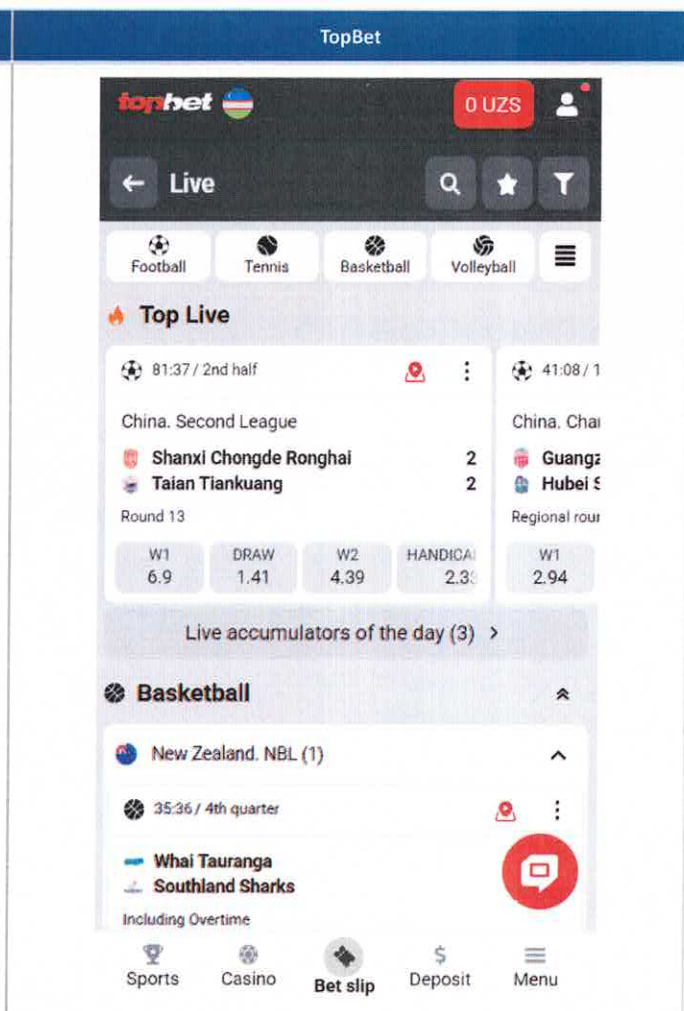


Figure A.10-2. TopBet evidence for Live betting page (source file 10.2.png).

Appendix A.11 Screenshot Evidence

Casino lobby

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
11.1 / 11.2	Show providers, categories, RTP/rules link where applicable and game launch control.	Desktop and Mobile/PWA where applicable	Screenshot inserted

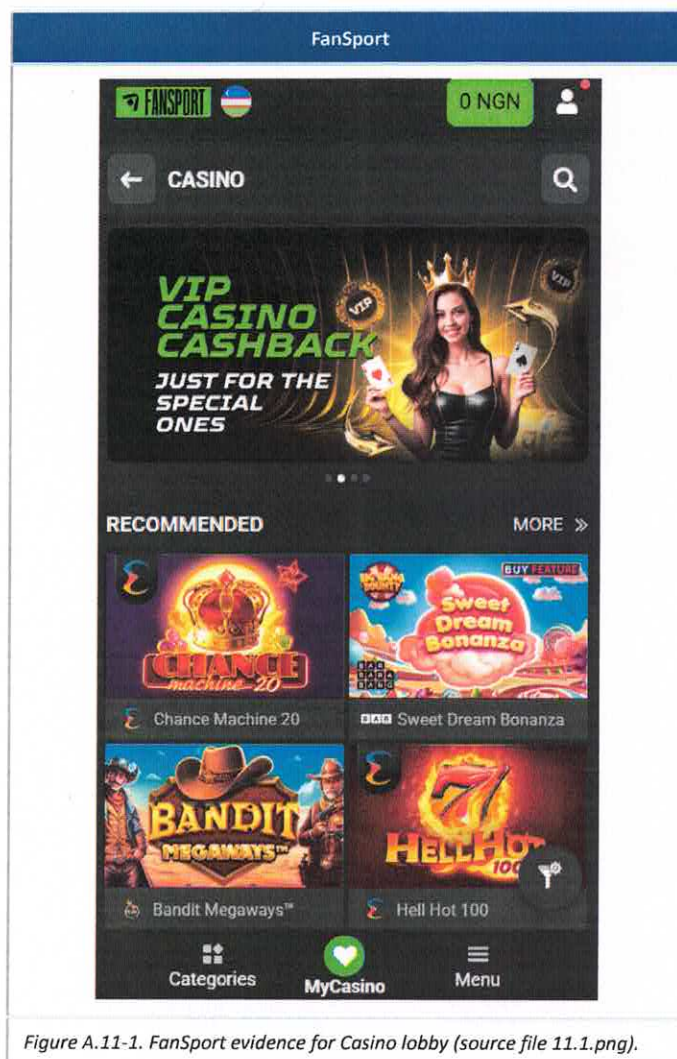


Figure A.11-1. FanSport evidence for Casino lobby (source file 11.1.png).

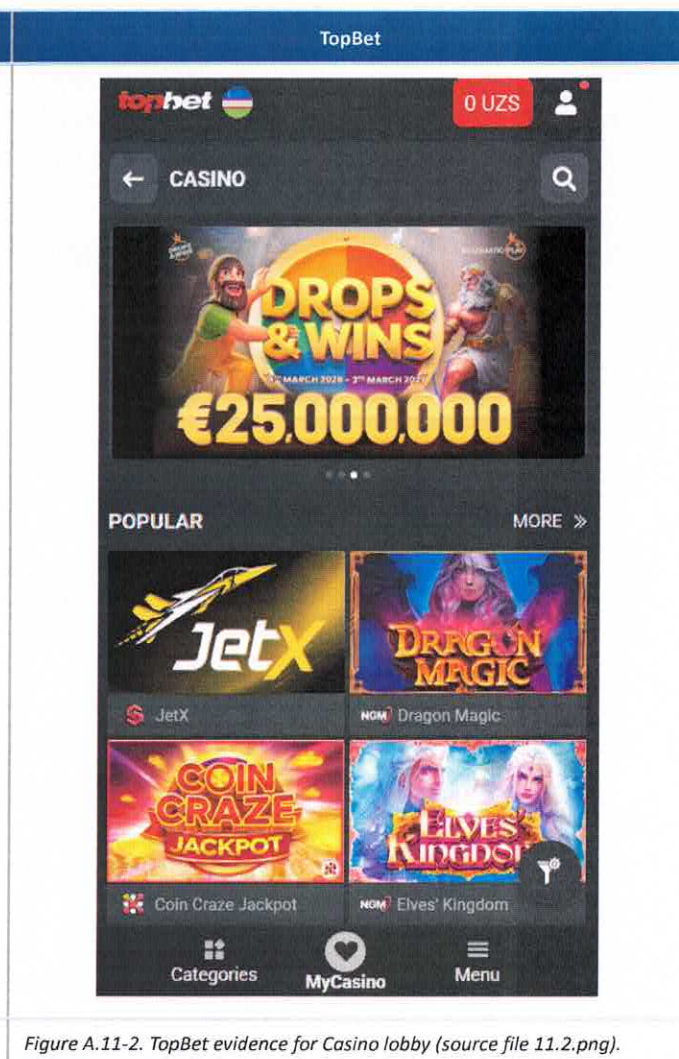


Figure A.11-2. TopBet evidence for Casino lobby (source file 11.2.png).

Appendix A.12 Screenshot Evidence

Casino game launch and interrupted round message

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
12.1 / 12.2	Show balance, game rules, round ID/evidence where applicable and error/restore behaviour.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	

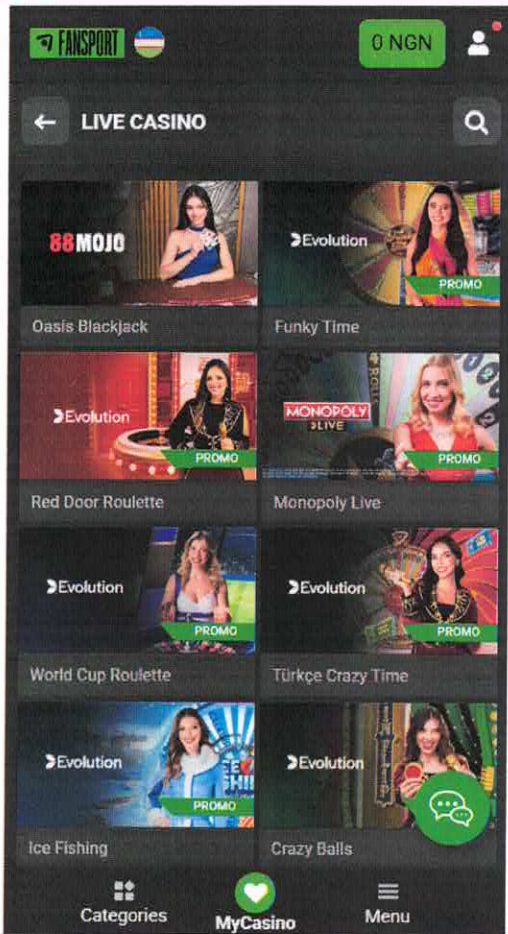
Figure A.12-1. FanSport evidence for Casino game launch and interrupted round message (source file 12.1.png).

Figure A.12-2. TopBet evidence for Casino game launch and interrupted round message (source file 12.2.png).

Appendix A.13 Screenshot Evidence

Live casino lobby and game table

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
13.1 / 13.2	Show provider, table limits, rules and game history access.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
Figure A.13-1. FanSport evidence for Live casino lobby and game table (source file 13.1.png).	Figure A.13-2. TopBet evidence for Live casino lobby and game table (source file 13.2.png).

Appendix A.14 Screenshot Evidence

Virtual sports page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
14.1 / 14.2	Show event schedule, rules, odds and results.	Desktop and Mobile/PWA where applicable	Screenshot inserted

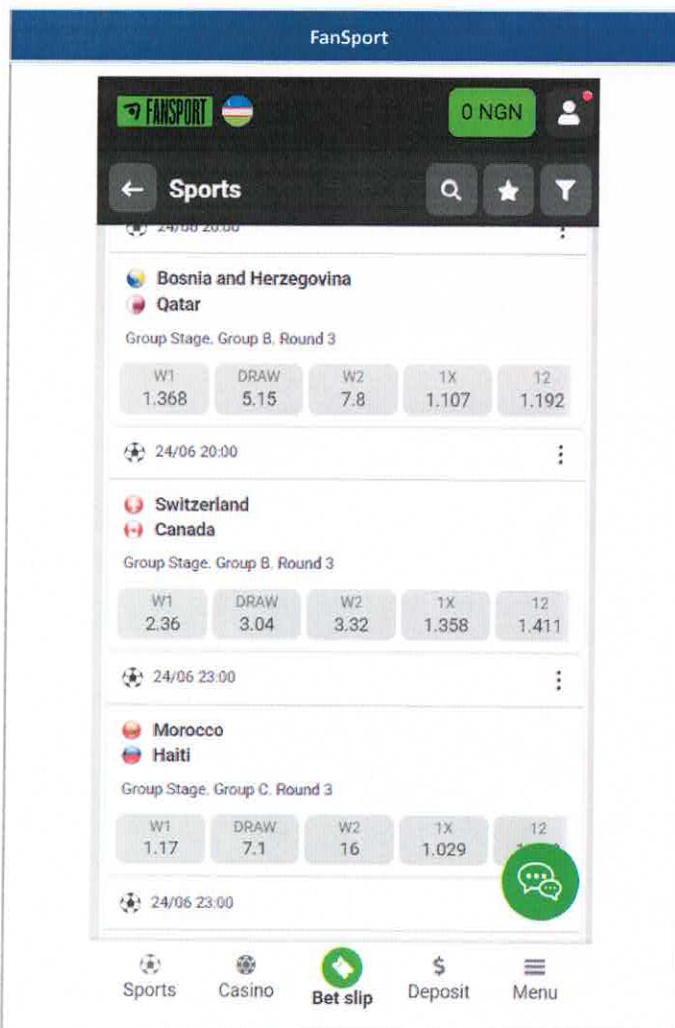


Figure A.14-1. FanSport evidence for Virtual sports page (source file 14.1.png).

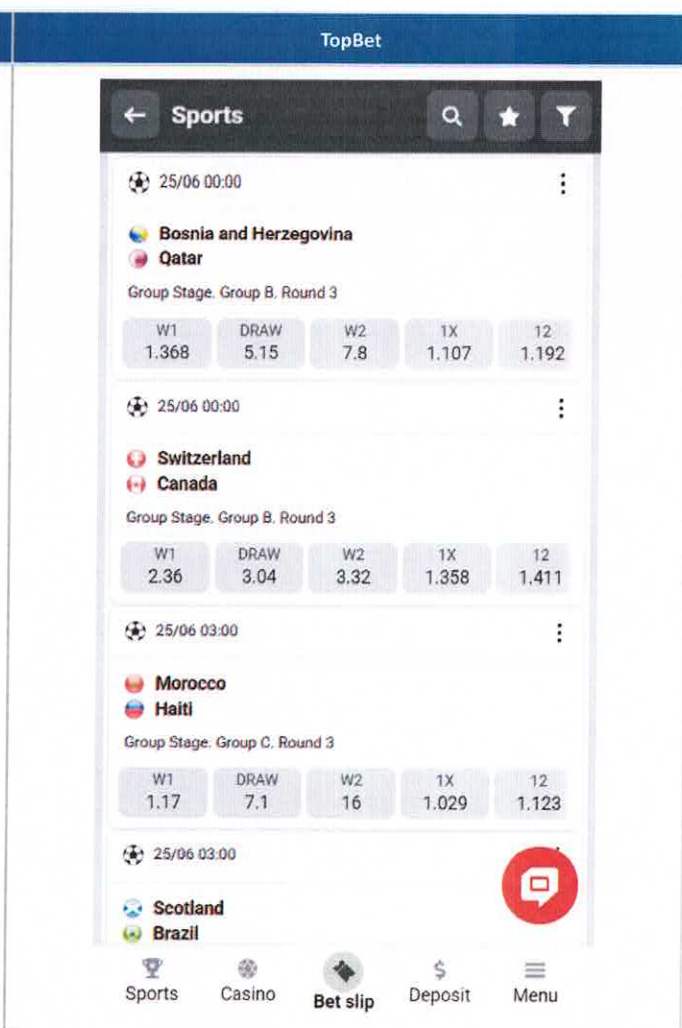


Figure A.14-2. TopBet evidence for Virtual sports page (source file 14.2.png).

Appendix A.15 Screenshot Evidence

Poker lobby / table / tournament if applicable

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
15.1 / 15.2	Show buy-in, rules, rake/prize information and account balance.	Desktop and Mobile/PWA where applicable	Screenshot inserted

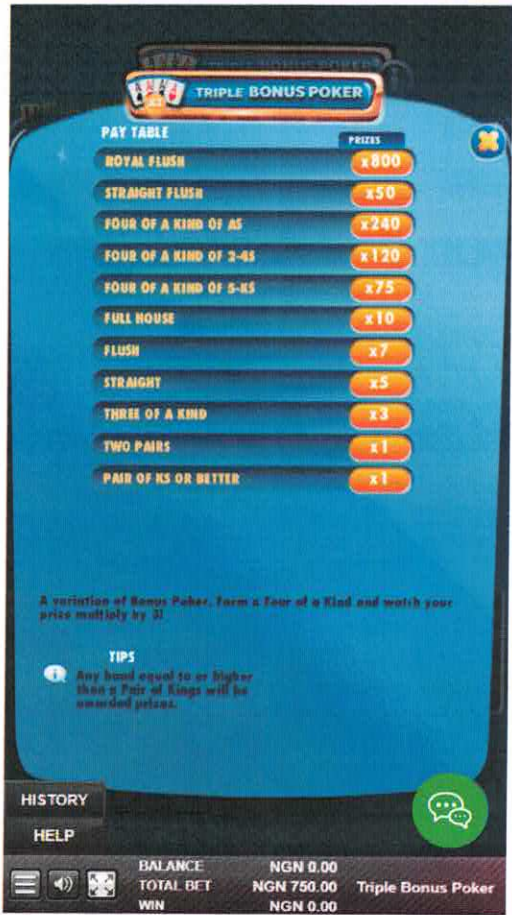
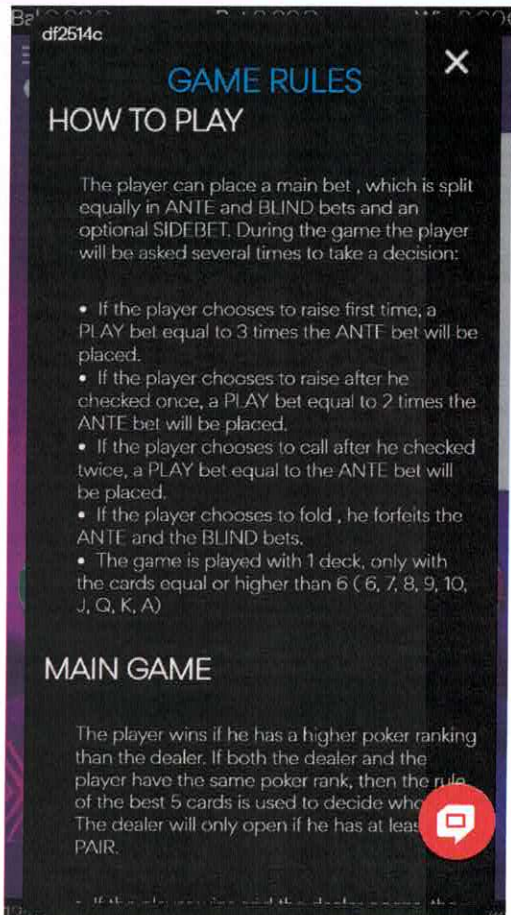
FanSport	TopBet																								
 The screenshot shows the 'TRIPLE BONUS POKER' interface. It features a 'PAY TABLE' with the following prizes: <table border="1"> <thead> <tr> <th>PRIZES</th> <th>PRIZES</th> </tr> </thead> <tbody> <tr> <td>ROYAL FLUSH</td> <td>x800</td> </tr> <tr> <td>STRAIGHT FLUSH</td> <td>x50</td> </tr> <tr> <td>FOUR OF A KIND OF AS</td> <td>x240</td> </tr> <tr> <td>FOUR OF A KIND OF 2-AS</td> <td>x120</td> </tr> <tr> <td>FOUR OF A KIND OF 5-KS</td> <td>x75</td> </tr> <tr> <td>FULL HOUSE</td> <td>x10</td> </tr> <tr> <td>FLUSH</td> <td>x7</td> </tr> <tr> <td>STRAIGHT</td> <td>x5</td> </tr> <tr> <td>THREE OF A KIND</td> <td>x3</td> </tr> <tr> <td>TWO PAIRS</td> <td>x1</td> </tr> <tr> <td>PAIR OF KS OR BETTER</td> <td>x1</td> </tr> </tbody> </table> A variation of Bonus Poker. Form a Four of a Kind and watch your prize multiply by 3! TIPS Any hand equal to or higher than a Pair of Kings will be awarded prizes. HISTORY HELP BALANCE NGN 0.00 TOTAL BET NGN 750.00 WIN NGN 0.00 Triple Bonus Poker	PRIZES	PRIZES	ROYAL FLUSH	x800	STRAIGHT FLUSH	x50	FOUR OF A KIND OF AS	x240	FOUR OF A KIND OF 2-AS	x120	FOUR OF A KIND OF 5-KS	x75	FULL HOUSE	x10	FLUSH	x7	STRAIGHT	x5	THREE OF A KIND	x3	TWO PAIRS	x1	PAIR OF KS OR BETTER	x1	 The screenshot shows the 'GAME RULES' and 'HOW TO PLAY' section for Triple Bonus Poker. It includes a list of rules: - The player can place a main bet, which is split equally in ANTE and BLIND bets and an optional SIDEBET. During the game the player will be asked several times to take a decision: - If the player chooses to raise first time, a PLAY bet equal to 3 times the ANTE bet will be placed. - If the player chooses to raise after he checked once, a PLAY bet equal to 2 times the ANTE bet will be placed. - If the player chooses to call after he checked twice, a PLAY bet equal to the ANTE bet will be placed. - If the player chooses to fold, he forfeits the ANTE and the BLIND bets. - The game is played with 1 deck, only with the cards equal or higher than 6 (6, 7, 8, 9, 10, J, Q, K, A) MAIN GAME The player wins if he has a higher poker ranking than the dealer. If both the dealer and the player have the same poker rank, then the rule of the best 5 cards is used to decide who wins. The dealer will only open if he has at least a PAIR.
PRIZES	PRIZES																								
ROYAL FLUSH	x800																								
STRAIGHT FLUSH	x50																								
FOUR OF A KIND OF AS	x240																								
FOUR OF A KIND OF 2-AS	x120																								
FOUR OF A KIND OF 5-KS	x75																								
FULL HOUSE	x10																								
FLUSH	x7																								
STRAIGHT	x5																								
THREE OF A KIND	x3																								
TWO PAIRS	x1																								
PAIR OF KS OR BETTER	x1																								

Figure A.15-1. FanSport evidence for Poker lobby / table / tournament if applicable (source file 15.1.png).

Figure A.15-2. TopBet evidence for Poker lobby / table / tournament if applicable (source file 15.2.png).

Appendix A.16 Screenshot Evidence

Bingo / TV games / scratch cards pages

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
16.1 / 16.2	Show rules, stake, prize, result and game history.	Desktop and Mobile/PWA where applicable	Screenshot inserted

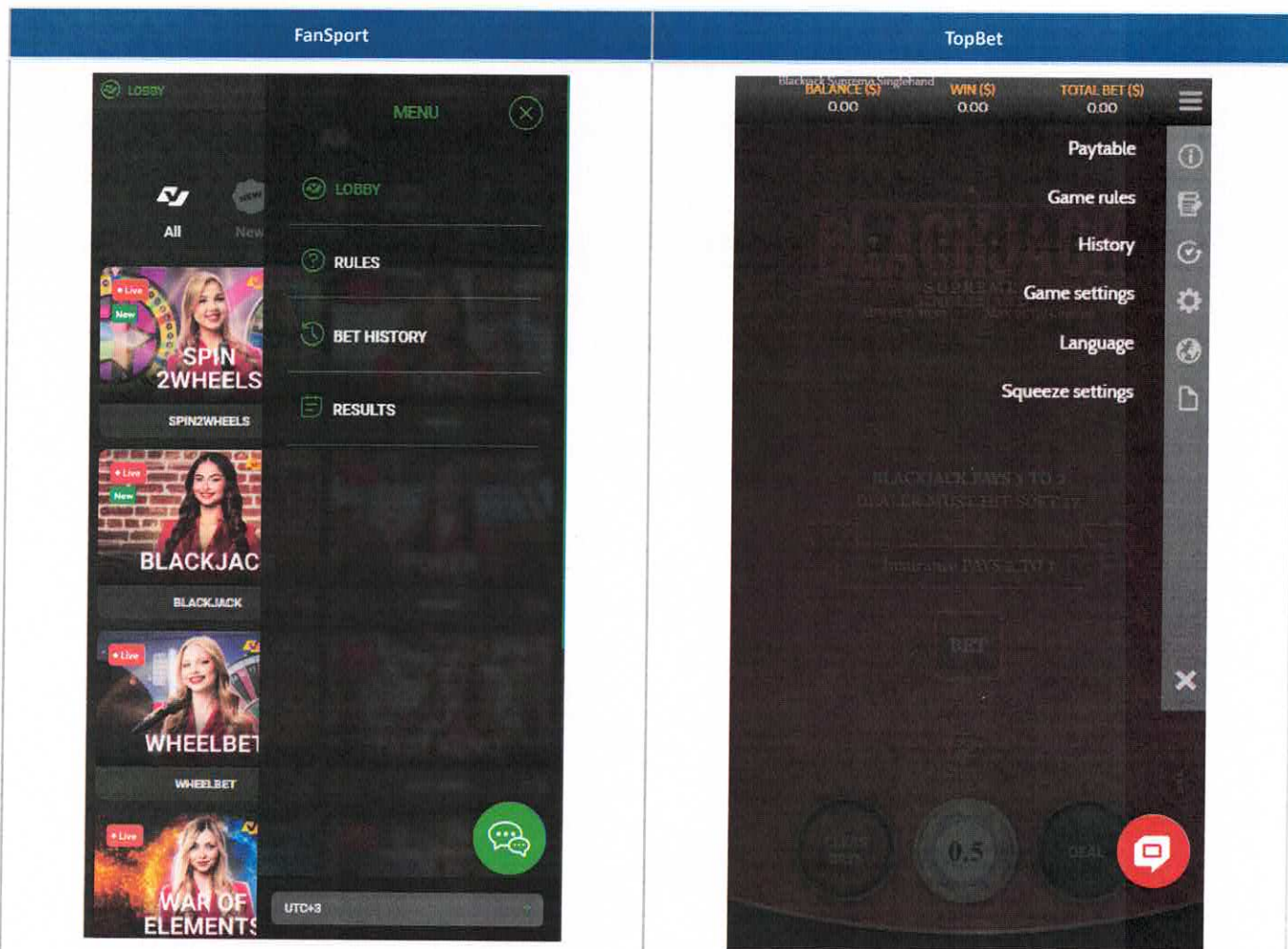


Figure A.16-1. FanSport evidence for Bingo / TV games / scratch cards pages (source file 16.1.png).

Figure A.16-2. TopBet evidence for Bingo / TV games / scratch cards pages (source file 16.2.png).

Appendix A.17 Screenshot Evidence

Responsible Gaming page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
17.1 / 17.2	Show 18+ notice, information, support resources, self-assessment and tools.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
i Information ^ - About us - Contacts - Affiliate Program - Become a MobCash agent - Become a E-wallet agent - Terms of Service - How to place a bet - Bet Calculator - Responsible Gambling - Self-exclusion - Dispute resolution - Anti-Money Laundering - Fairness & RNG Testing Methods - KYC Policies - Privacy & Management of Personal  - Accounts, Payouts & Bonuses - Payment methods	i Information ^ - About us - Terms and Conditions - Cookie Policy - Become an agent - How to place a bet - Payment methods - Contacts - Affiliate Program - Responsible Gambling - Self-exclusion - Dispute resolution - Anti-Money Laundering - Fairness & RNG Testing Methods - KYC Policies - Privacy & Management of Personal  - Accounts, Payouts & Bonuses - Betting rules
Figure A.17-1. FanSport evidence for Responsible Gaming page (source file 17.1.png).	Figure A.17-2. TopBet evidence for Responsible Gaming page (source file 17.2.png).

Appendix A.18 Screenshot Evidence

Deposit limit flow

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
18.1 / 18.2	Show 24-hour, 7-day, 30-day limit creation/change and confirmation.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
 The screenshot shows the 'SELF-EXCLUSION' screen on the FanSport mobile app. At the top, there is a dark header with a back arrow and the text 'SELF-EXCLUSION'. Below this, a list of options is displayed: 'days: 1', 'days: 7', 'months: 1', 'months: 3', 'years: 1', 'years: 3', 'years: 5', 'years: 10', and 'Permanently'. Each option is in a white box with a light blue border. At the bottom right of the screen, there is a green circular icon with a white speech bubble.	 The screenshot shows the 'SELF-EXCLUSION' screen on the TopBet mobile app. At the top, there is a dark header with a back arrow and the text 'SELF-EXCLUSION'. Below this, a list of options is displayed: 'days: 1', 'days: 7', 'months: 1', 'months: 3', 'years: 1', 'years: 3', 'years: 5', 'years: 10', and 'Permanently'. Each option is in a white box with a light blue border. At the bottom right of the screen, there is a red circular icon with a white speech bubble.
<i>Figure A.18-1. FanSport evidence for Deposit limit flow (source file 18.1.png).</i>	<i>Figure A.18-2. TopBet evidence for Deposit limit flow (source file 18.2.png).</i>

Appendix A.19 Screenshot Evidence

Loss and session/time limit flow

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
19.1 / 19.2	Show limit configuration and confirmation.	Desktop and Mobile/PWA where applicable	Screenshot inserted

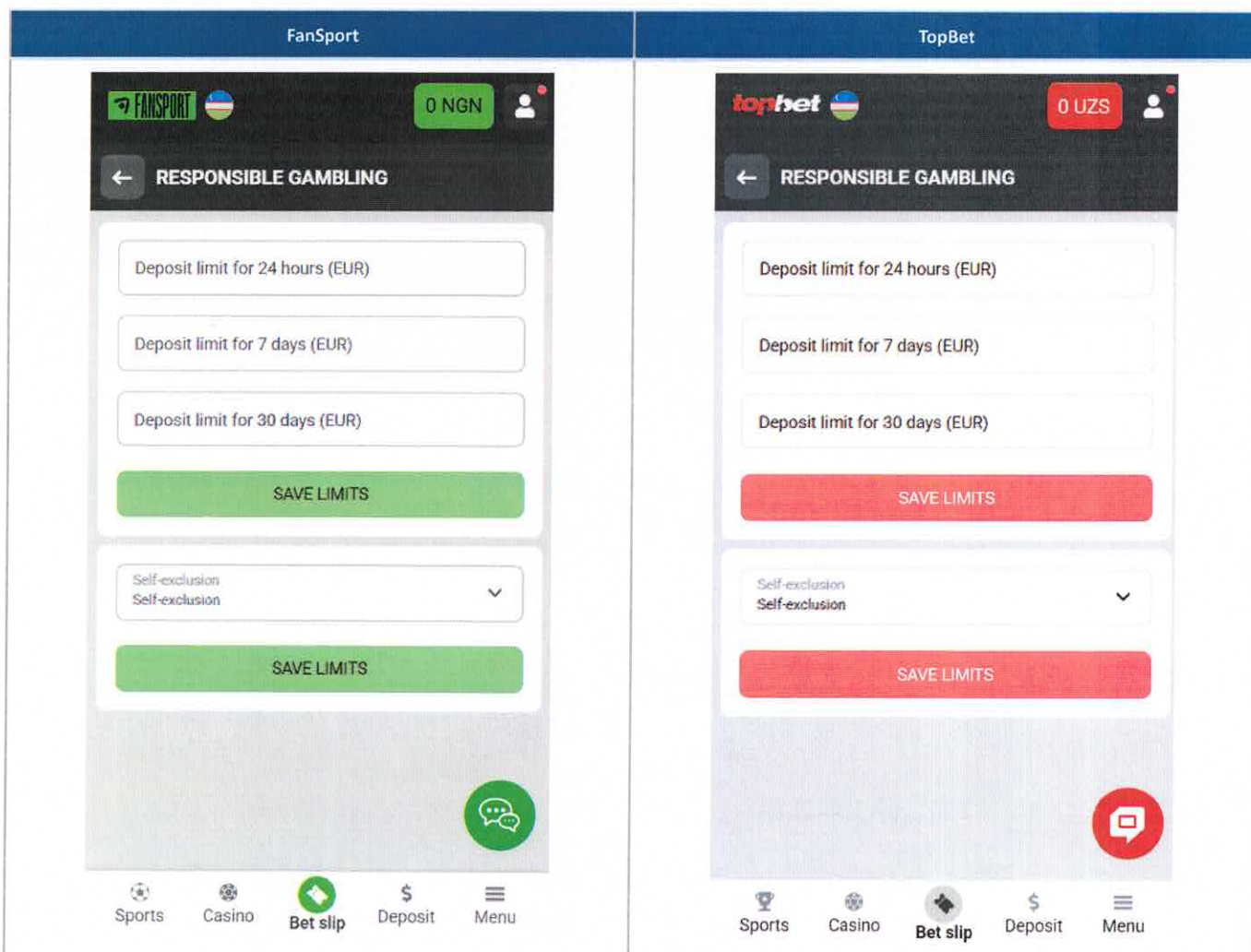


Figure A.19-1. FanSport evidence for Loss and session/time limit flow (source file 19.1.png).

Figure A.19-2. TopBet evidence for Loss and session/time limit flow (source file 19.2.png).

Appendix A.20 Screenshot Evidence

Reality check / session reminder

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
20.1 / 20.2	Show active reminder during play.	Desktop and Mobile/PWA where applicable	Screenshot inserted

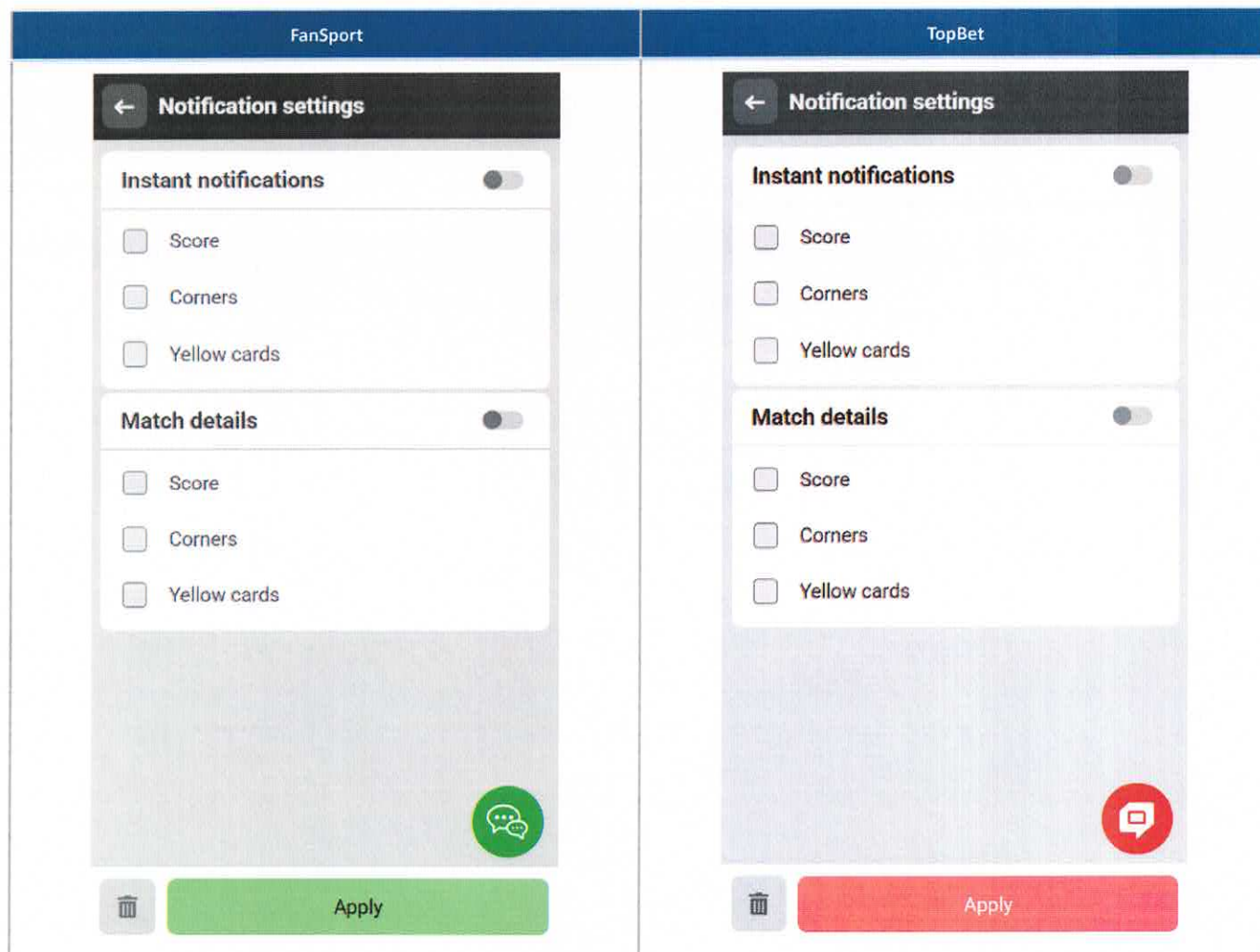


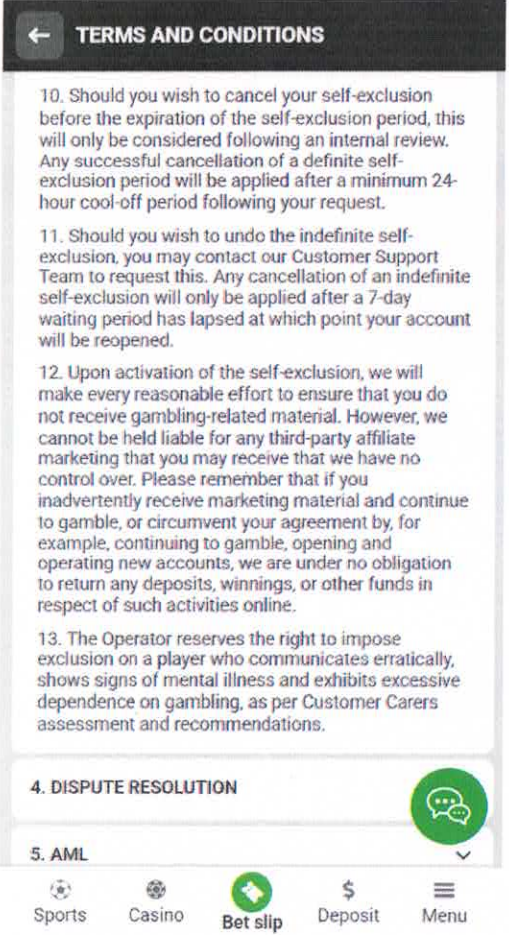
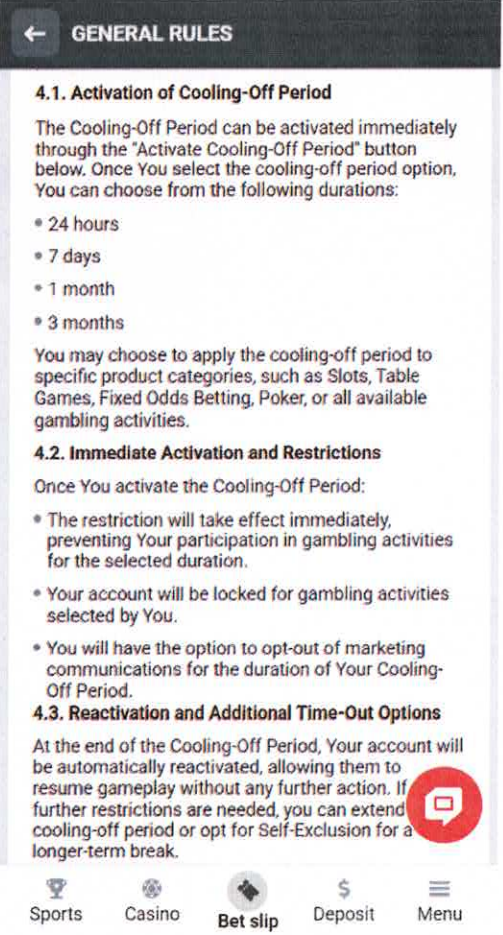
Figure A.20-1. FanSport evidence for Reality check / session reminder (source file 20.1.png).

Figure A.20-2. TopBet evidence for Reality check / session reminder (source file 20.2.png).

Appendix A.21 Screenshot Evidence

Cooling-off flow

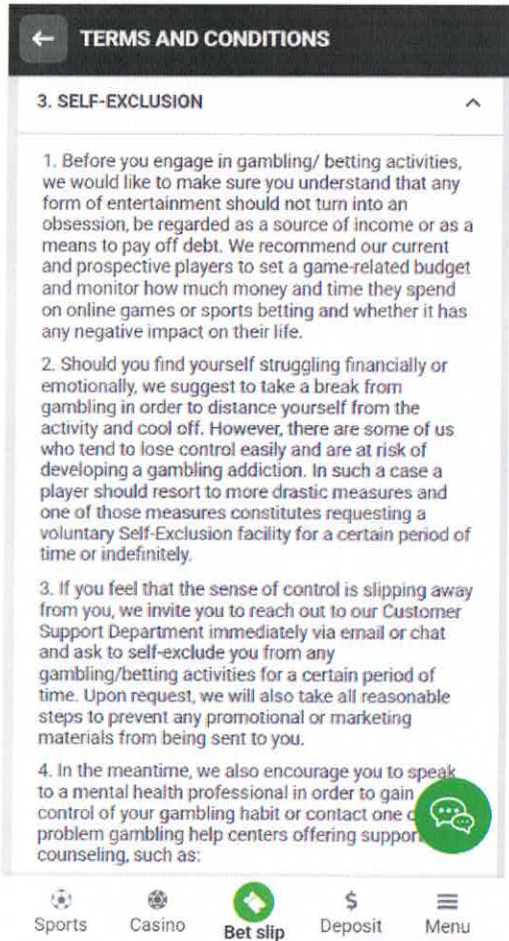
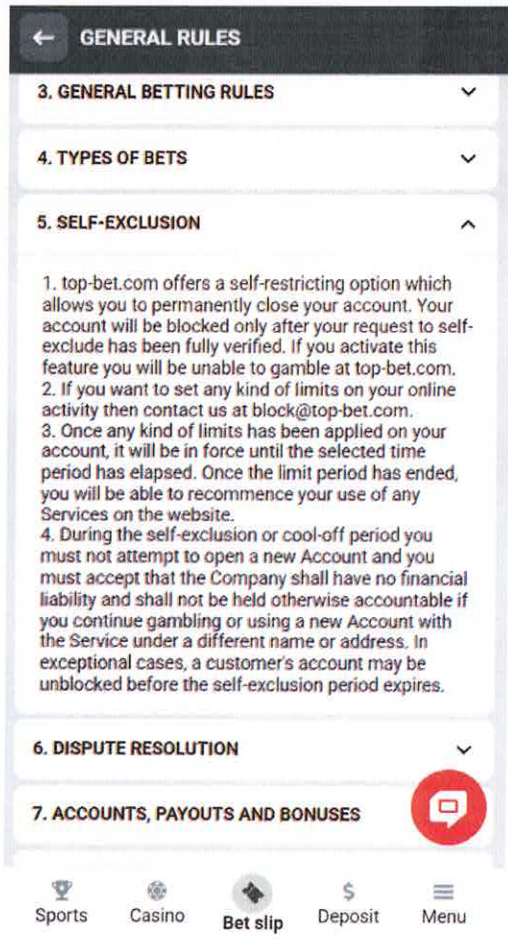
EVIDENCE ID	REQUIREMENT	VIEW	STATUS
21.1 / 21.2	Show available periods, confirmation and effect on account.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
 10. Should you wish to cancel your self-exclusion before the expiration of the self-exclusion period, this will only be considered following an internal review. Any successful cancellation of a definite self-exclusion period will be applied after a minimum 24-hour cool-off period following your request. 11. Should you wish to undo the indefinite self-exclusion, you may contact our Customer Support Team to request this. Any cancellation of an indefinite self-exclusion will only be applied after a 7-day waiting period has lapsed at which point your account will be reopened. 12. Upon activation of the self-exclusion, we will make every reasonable effort to ensure that you do not receive gambling-related material. However, we cannot be held liable for any third-party affiliate marketing that you may receive that we have no control over. Please remember that if you inadvertently receive marketing material and continue to gamble, or circumvent your agreement by, for example, continuing to gamble, opening and operating new accounts, we are under no obligation to return any deposits, winnings, or other funds in respect of such activities online. 13. The Operator reserves the right to impose exclusion on a player who communicates erratically, shows signs of mental illness and exhibits excessive dependence on gambling, as per Customer Carers assessment and recommendations. 4. DISPUTE RESOLUTION 5. AML Sports Casino Bet slip Deposit Menu	 4.1. Activation of Cooling-Off Period The Cooling-Off Period can be activated immediately through the "Activate Cooling-Off Period" button below. Once You select the cooling-off period option, You can choose from the following durations: • 24 hours • 7 days • 1 month • 3 months You may choose to apply the cooling-off period to specific product categories, such as Slots, Table Games, Fixed Odds Betting, Poker, or all available gambling activities. 4.2. Immediate Activation and Restrictions Once You activate the Cooling-Off Period: • The restriction will take effect immediately, preventing Your participation in gambling activities for the selected duration. • Your account will be locked for gambling activities selected by You. • You will have the option to opt-out of marketing communications for the duration of Your Cooling-Off Period. 4.3. Reactivation and Additional Time-Out Options At the end of the Cooling-Off Period, Your account will be automatically reactivated, allowing them to resume gameplay without any further action. If further restrictions are needed, you can extend cooling-off period or opt for Self-Exclusion for a longer-term break. Sports Casino Bet slip Deposit Menu
Figure A.21-1. FanSport evidence for Cooling-off flow (source file 21.1.png).	Figure A.21-2. TopBet evidence for Cooling-off flow (source file 21.2.png).

Appendix A.22 Screenshot Evidence

Self-exclusion flow

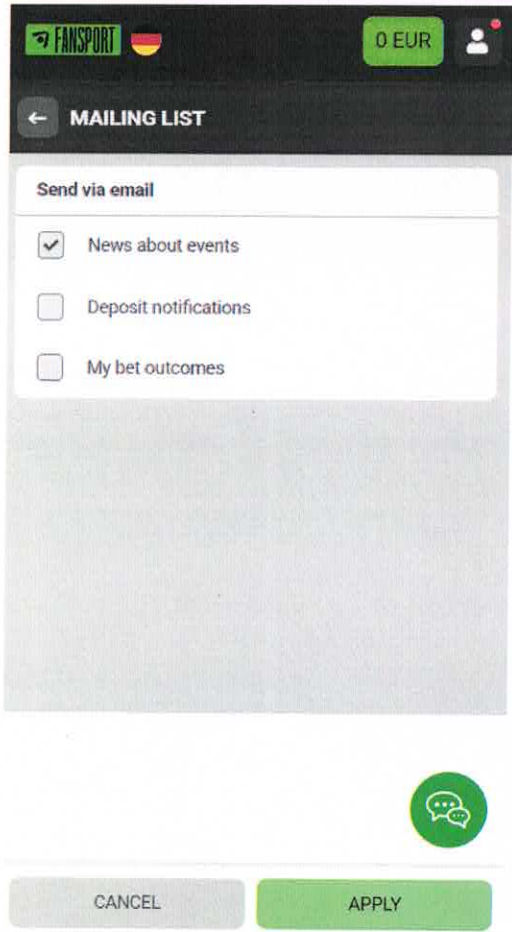
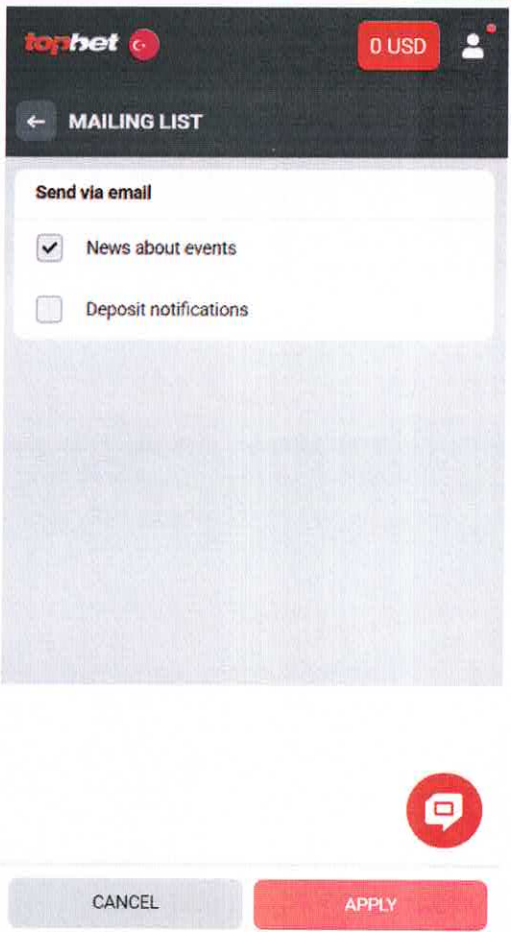
EVIDENCE ID	REQUIREMENT	VIEW	STATUS
22.1 / 22.2	Show 1, 3, 5, 10-year and lifetime periods, immediate effect and withdrawal access.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
 The screenshot shows the 'TERMS AND CONDITIONS' page on the FanSport mobile app. The '3. SELF-EXCLUSION' section is expanded, displaying four numbered paragraphs. Paragraph 1 discusses the risks of gambling and recommends budgeting. Paragraph 2 suggests taking a break if struggling financially. Paragraph 3 offers a voluntary self-exclusion facility. Paragraph 4 encourages seeking professional help. A green chat bubble icon is visible on the right side of the text. At the bottom, there is a navigation bar with icons for Sports, Casino, Bet slip, Deposit, and Menu.	 The screenshot shows the 'GENERAL RULES' page on the TopBet mobile app. The '5. SELF-EXCLUSION' section is expanded, displaying four numbered paragraphs. Paragraph 1 describes the self-restricting option. Paragraph 2 mentions contacting support for limits. Paragraph 3 states the duration of self-exclusion. Paragraph 4 explains the consequences during the self-exclusion period. A red chat bubble icon is visible on the right side of the text. Below the self-exclusion section, there are sections for '6. DISPUTE RESOLUTION' and '7. ACCOUNTS, PAYOUTS AND BONUSES'. At the bottom, there is a navigation bar with icons for Sports, Casino, Bet slip, Deposit, and Menu.
Figure A.22-1. FanSport evidence for Self-exclusion flow (source file 22.1.png).	Figure A.22-2. TopBet evidence for Self-exclusion flow (source file 22.2.png).

Appendix A.23 Screenshot Evidence

Marketing preferences / opt-out

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
23.1 / 23.2	Show opt-out controls for email, SMS, phone, push and promotions.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
<i>Figure A.23-1. FanSport evidence for Marketing preferences / opt-out (source file 23.1.png).</i>	<i>Figure A.23-2. TopBet evidence for Marketing preferences / opt-out (source file 23.2.png).</i>

Appendix A.24 Screenshot Evidence

Complaint submission form

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
24.1 / 24.2	Show complaint category, fields, attachment, free complaint notice and ticket submission.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
Figure A.24-1. FanSport evidence for Complaint submission form (source file 24.1.png).	Figure A.24-2. TopBet evidence for Complaint submission form (source file 24.2.png).

Appendix A.25 Screenshot Evidence

Support chat / email / help centre

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
25.1 / 25.2	Show support channels and contact details.	Desktop and Mobile/PWA where applicable	Screenshot inserted

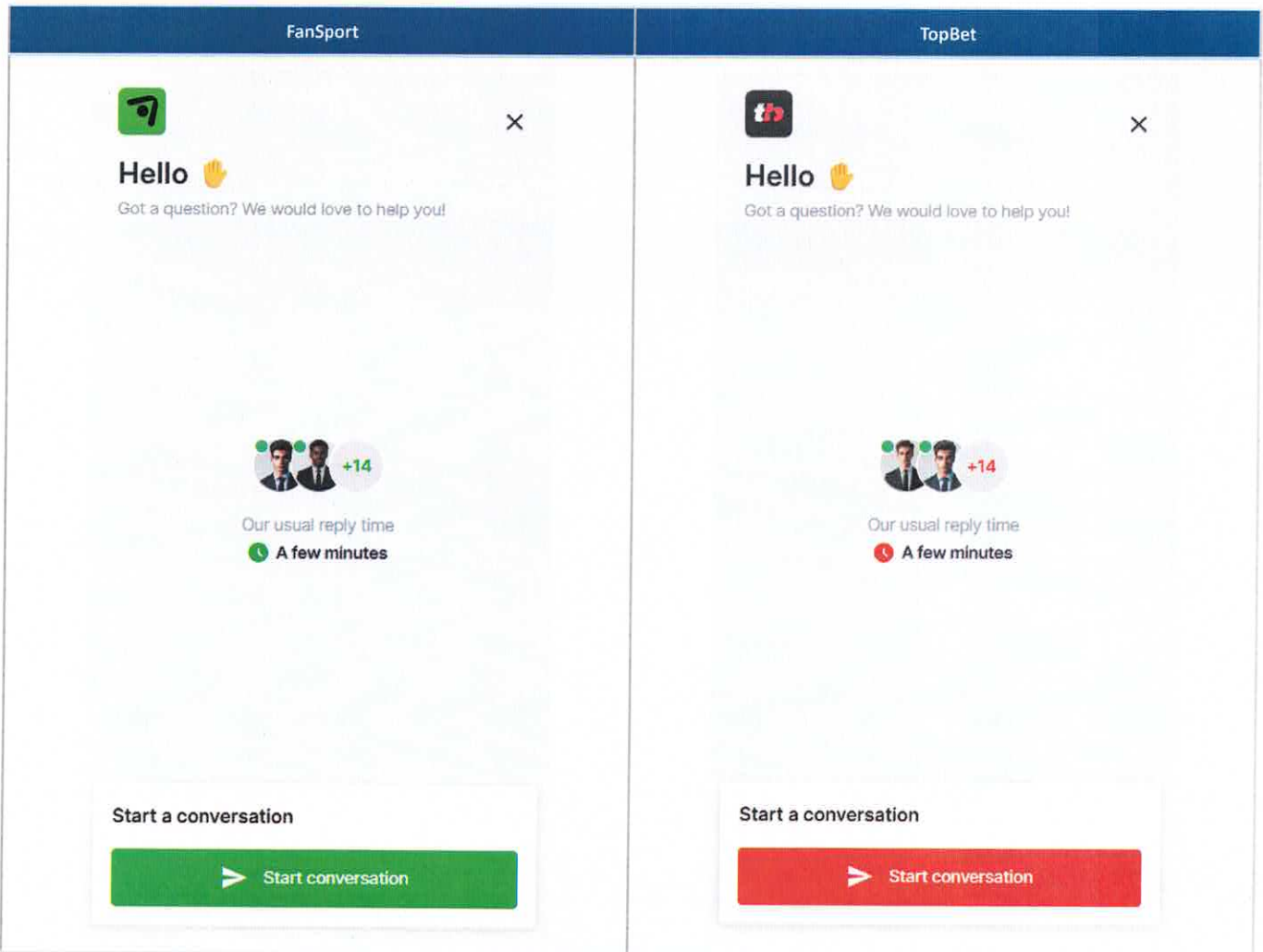


Figure A.25-1. FanSport evidence for Support chat / email / help centre (source file 25.1.png).

Figure A.25-2. TopBet evidence for Support chat / email / help centre (source file 25.2.png).

Appendix A.27 Screenshot Evidence

Terms and policy pages

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
27.1 / 27.2	Show version date, operator information and access from footer/account menu.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
• Terms of Service • How to place a bet • Bet Calculator • Responsible Gambling • Self-exclusion • Dispute resolution • Anti-Money Laundering • Fairness & RNG Testing Methods • KYC Policies • Privacy & Management of Personal Data • Accounts, Payouts & Bonuses • Payment methods  Terms and Conditions   Consultant  Mobile application   Log out	• Terms and Conditions • Cookie Policy • Become an agent • How to place a bet • Payment methods • Contacts • Affiliate Program • Responsible Gambling • Self-exclusion • Dispute resolution • Anti-Money Laundering • Fairness & RNG Testing Methods • KYC Policies • Privacy & Management of Personal Data • Accounts, Payouts & Bonuses • Betting rules • Risk warning  Consultant 

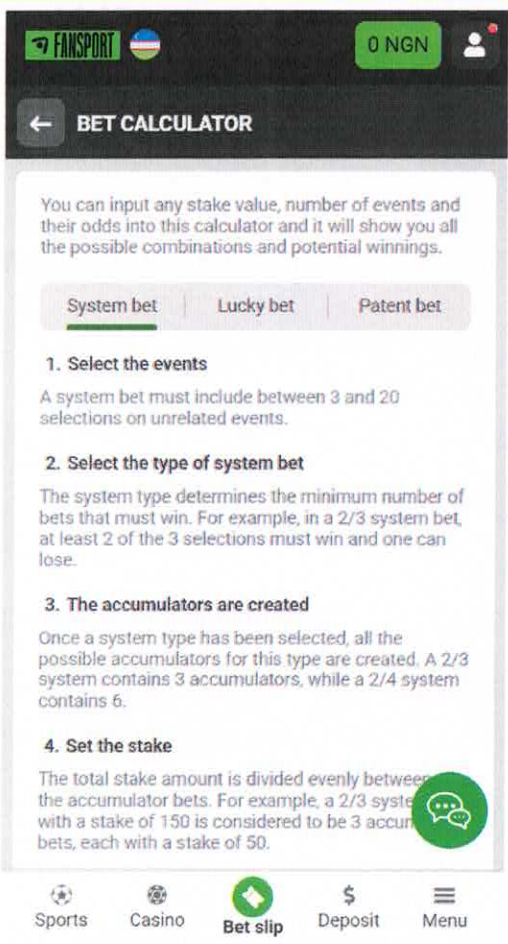
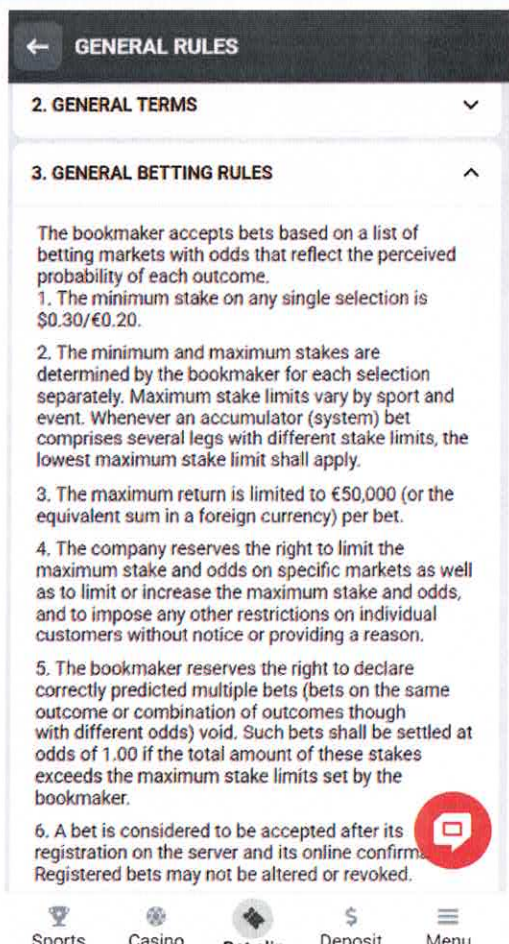
Figure A.27-1. FanSport evidence for Terms and policy pages (source file 27.1.png).

Figure A.27-2. TopBet evidence for Terms and policy pages (source file 27.2.png).

Appendix A.28 Screenshot Evidence

Game rules / sports rules / casino rules pages

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
28.1 / 28.2	Show rules, odds/RTP/payout method and settlement information.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
 BET CALCULATOR You can input any stake value, number of events and their odds into this calculator and it will show you all the possible combinations and potential winnings. System bet Lucky bet Patent bet Select the events A system bet must include between 3 and 20 selections on unrelated events. Select the type of system bet The system type determines the minimum number of bets that must win. For example, in a 2/3 system bet, at least 2 of the 3 selections must win and one can lose. The accumulators are created Once a system type has been selected, all the possible accumulators for this type are created. A 2/3 system contains 3 accumulators, while a 2/4 system contains 6. Set the stake The total stake amount is divided evenly between the accumulator bets. For example, a 2/3 system with a stake of 150 is considered to be 3 accumulator bets, each with a stake of 50. Sports Casino Bet slip Deposit Menu	 GENERAL RULES 2. GENERAL TERMS 3. GENERAL BETTING RULES The bookmaker accepts bets based on a list of betting markets with odds that reflect the perceived probability of each outcome. - The minimum stake on any single selection is \$0.30/€0.20. - The minimum and maximum stakes are determined by the bookmaker for each selection separately. Maximum stake limits vary by sport and event. Whenever an accumulator (system) bet comprises several legs with different stake limits, the lowest maximum stake limit shall apply. - The maximum return is limited to €50,000 (or the equivalent sum in a foreign currency) per bet. - The company reserves the right to limit the maximum stake and odds on specific markets as well as to limit or increase the maximum stake and odds, and to impose any other restrictions on individual customers without notice or providing a reason. - The bookmaker reserves the right to declare correctly predicted multiple bets (bets on the same outcome or combination of outcomes though with different odds) void. Such bets shall be settled at odds of 1.00 if the total amount of these stakes exceeds the maximum stake limits set by the bookmaker. - A bet is considered to be accepted after its registration on the server and its online confirmation. Registered bets may not be altered or revoked. Sports Casino Bet slip Deposit Menu
Figure A.28-1. FanSport evidence for Game rules / sports rules / casino rules pages (source file 28.1.png).	Figure A.28-2. TopBet evidence for Game rules / sports rules / casino rules pages (source file 28.2.png).

Appendix A.29 Screenshot Evidence

Bonus terms / offer opt-in page

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
29.1 / 29.2	Show wagering, expiry, eligibility, restrictions and withdrawal terms.	Desktop and Mobile/PWA where applicable	Screenshot inserted

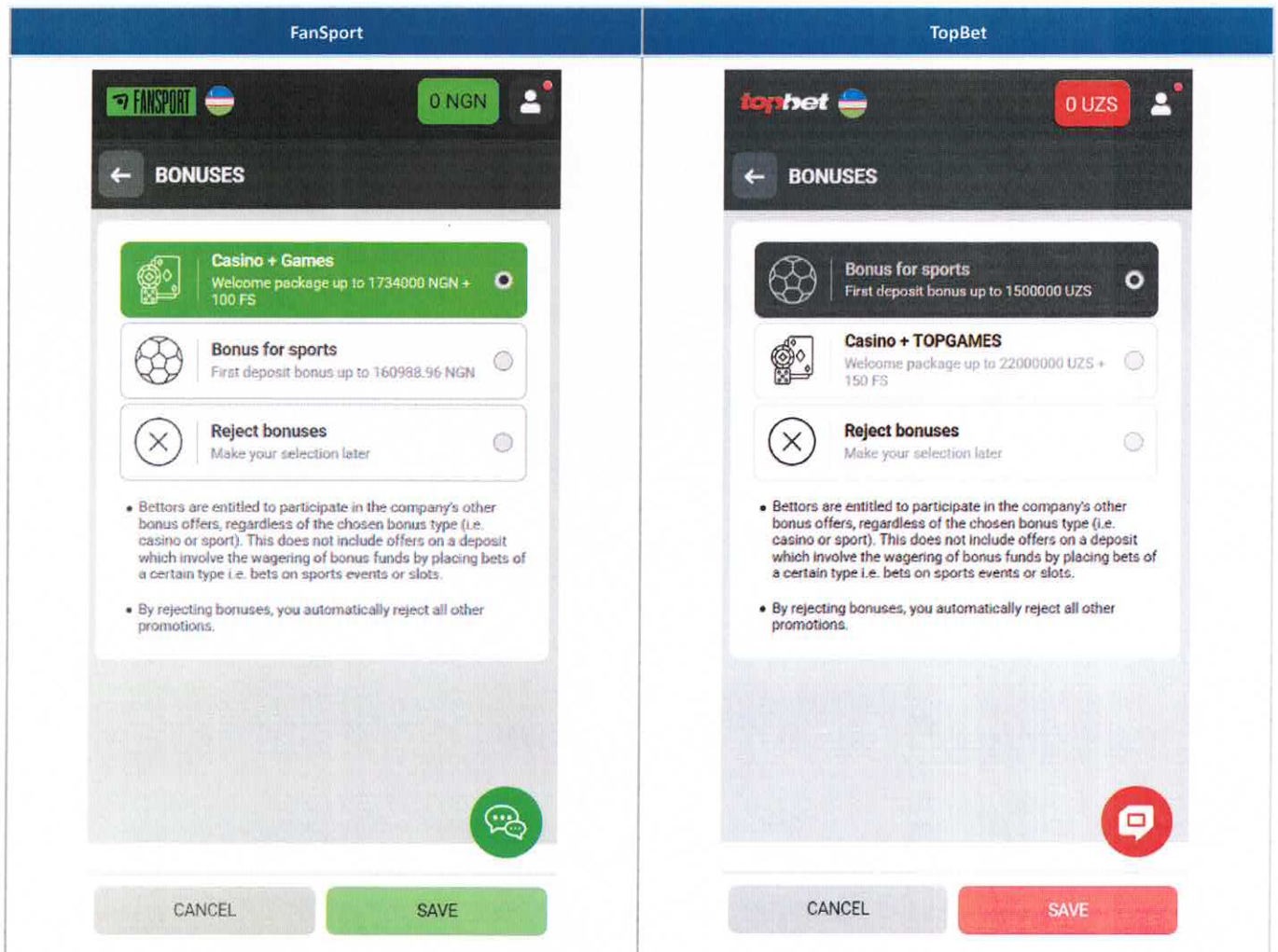


Figure A.29-1. FanSport evidence for Bonus terms / offer opt-in page (source file 29.1.png).

Figure A.29-2. TopBet evidence for Bonus terms / offer opt-in page (source file 29.2.png).

Appendix A.30 Screenshot Evidence

Error pages and restricted account messages

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
30.1 / 30.2	Show blocked self-excluded account, KYC restriction, country restriction and responsible gaming restriction messages.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport





ACCESS DENIED!

This website is not available in your country.

 **US** 89.38.227.188

 **CUSTOMER SUPPORT**

Figure A.30-1. FanSport evidence for Error pages and restricted account messages (source file 30.1.png).

TopBet





ACCESS DENIED!

This website is not available in your country.

 **AT** 37.19.195.80

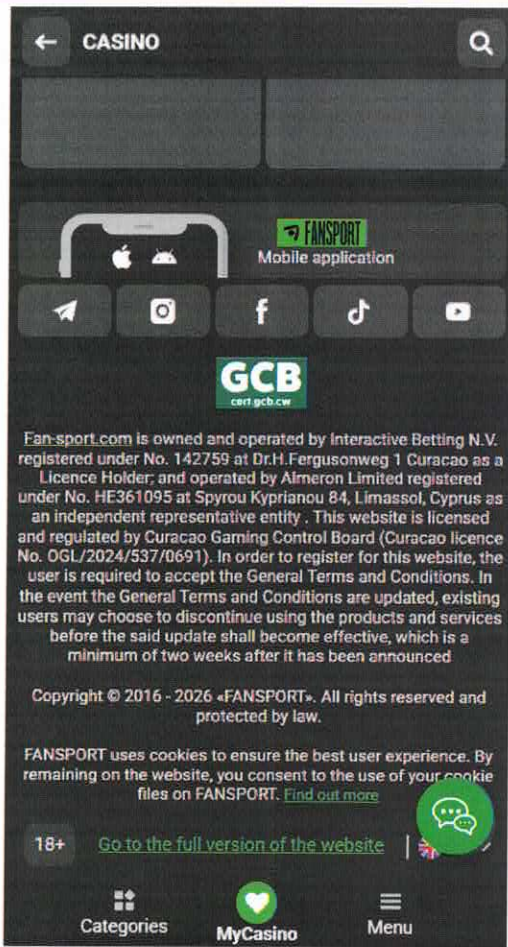
 **CUSTOMER SUPPORT**

Figure A.30-2. TopBet evidence for Error pages and restricted account messages (source file 30.2.png).

Appendix A.31 Screenshot Evidence

CGA seal verification click-through

EVIDENCE ID	REQUIREMENT	VIEW	STATUS
31.1 / 31.2	Show dynamic seal display and verification behaviour.	Desktop and Mobile/PWA where applicable	Screenshot inserted

FanSport	TopBet
	
Figure A.31-1. FanSport evidence for CGA seal verification click-through (source file 31.1.png).	Figure A.31-2. TopBet evidence for CGA seal verification click-through (source file 31.2.png).

Appendix B. Controlled Values and Evidence Register

The following controlled values are factual entries or evidence references that must remain traceable to the approved evidence pack. Operational procedures are fully written in the manual and are not open procedural text.

Category	Controlled Value / Evidence Location	Where Used
Person / Role Name	Operational role titles used where named individuals are not required in the manual body.	Sections 1, 3, 5, 6, 13, 16, 17, 18, 19, 20
Supplier / Provider Information	Platform Provider, integrated suppliers and supporting Platform evidence pack records.	Sections 5, 6, 12, 13, 16, 20
Domain / URL	FanSport and TopBet main domains, affiliate entrances, mobile/PWA URLs, policy URLs and ADR URL.	Sections 3, 15, 16
Certification / Evidence Reference	Game/RNG/sportsbook certification, penetration test, vulnerability assessment, backup/restore test, Tier-IV certificate, independent expert reports.	Sections 6, 7, 13, 17, 20
Betting Values	Configured in the platform/back-office limits register and retained with the approved evidence pack.	Section 5.2
Repository Path / Contract Reference	Operator compliance evidence repository / Platform evidence pack.	Sections 6, 20
Dates / Signature Fields	Approval dates and signatures completed during management sign-off.	Sections 15 and 20

Appendix C. Legal and Regulatory Sources

The following sources were used to align the manual at the verification date. The official Dutch version of CGA licence conditions prevails where CGA states that the English translation differs.

Source	URL / Reference	Use in Manual
CGA Official Licence Registry	https://gamingcontrol.spin-cdn.com/media/license_registry/20260622_20260622_ogl_license_registry.pdf	Interactive Betting N.V. registry entry and licence status.
CGA Indefinite-Term Online Gaming Licence Conditions	https://portal.cga.cw/page/license-conditions-indefinite-term-online-gaming-license	Licence conditions covering domains, suppliers, safe environment, equipment, payments, games, T&C, public information, reporting, Tier-IV records and policies.
CGA Publications Portal	https://portal.cga.cw/page/publications	Official publication hub for LOK, policies, guidelines and licence conditions.
Responsible Gaming Policy for Curaçao Licensed Operators	CGA publication available through the CGA Publications Portal	Responsible gaming tools, self-exclusion, interventions, marketing and training.
AML/CFT Policy and Procedure Guidelines	CGA publication available through the CGA Publications Portal	Business risk assessment, CDD/EDD, unusual transaction reporting, sanctions and training.
Complaints Policy for Curaçao Licensed Operators	CGA publication available through the CGA Publications Portal	Complaint submission, handling, deadlines, records and reporting.
Alternative Dispute Resolution Certification Guidelines	CGA publication available through the CGA Publications Portal	ADR provider requirements, operator engagement, player access and costs.
Test Lab Certification Policy	CGA publication available through the CGA Publications Portal	Approved testing and certification approach for games/software.
Supplied LOK Requirements PDF	1. Requirements - LOK (english) 250128 FINAL.pdf	LOK Article 5.9 operations manual requirements and related reporting/record keeping requirements.



(SMES) Solutions for Management and Employment Support N.V.

Managing Director

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